

Public Document Pack

Peak District National Park Authority

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Aldern House, Baslow Road, Bakewell, Derbyshire. DE45 1AE



Our Values: Care – Enjoy – Pioneer

Our Ref: A.1142/3059

Date: 27 January 2022



NOTICE OF MEETING

Meeting: **National Park Authority**

Date: **Friday 4 February 2022**

Time: **10.00 am**

Venue: **The Palace Hotel, Buxton, SK17 6AG**

(Venue site plan attached)

SARAH FOWLER
CHIEF EXECUTIVE



Link to meeting papers:

<https://democracy.peakdistrict.gov.uk/ieListDocuments.aspx?MIId=2398>

AGENDA

Location Plan for The Palace Hotel, Buxton

1. **Roll Call of Members Present, Apologies for Absence and Members' Declarations of Interest**
2. **Minutes of previous meeting of 12th November 2021** (*Pages 7 - 16*) 5 mins
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.

FOR INFORMATION

5. **Chair's Briefing** 5 mins
6. **Chief Executive's Report (SLF)** (*Pages 17 - 72*) 5 mins
Appendix 1
Appendix 2
Appendix 3
Appendix 4

FOR DECISION

7. **2022/23 Revenue Budget, 2022/23 Capital Programme and Medium Term Financial Plan 2022/23 TO 2025/26 (JW)** (*Pages 73 - 90*) 30 mins
Appendix 1a
Appendix 1b
Appendix 2
Appendix 3
Appendix 4
8. **External Audit (Mazars): 2020/21 Annual Audit Report (JW)** (*Pages 91 - 114*) 15 mins
Appendix 1
Appendix 2

9. **Internal Audit Report Block 1 2021/22 (JW)** *(Pages 115 - 140)* 15 mins
Appendix 1
Appendix 2
Appendix 3

FOR DISCUSSION

10. **A57 Link Roads Scheme (TN)** *(Pages 141 - 232)* 45 mins
Appendix 1
Appendix 2

FOR INFORMATION

11. **Reports from Outside Bodies - None Submitted** 5 mins

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 <http://democracy.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 on the Authority's website.

Public Participation and Other Representations from third parties

In response to the Coronavirus (Covid -19) emergency our head office at Aldern House in Bakewell has been closed. However as the Coronavirus restrictions ease the Authority is returning to physical meetings but within current social distancing guidance. Therefore meetings of the Authority and its Committees may take place at venues other than its offices at Aldern House, Bakewell. Public participation is still available and anyone wishing to participate at the meeting under the Authority's Public Participation Scheme is required to give notice to the Head of Law to be received not later than 12.00 noon on the Wednesday preceding the Friday meeting. The Scheme is available on the website <http://www.peakdistrict.gov.uk/looking-after/about-us/have-your-say> or on request from the Democratic and Legal Support Team 01629 816362, email address: democraticandlegalsupport@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

In response to the Coronavirus (Covid -19) emergency our head office at Aldern House in Bakewell has been closed. The Authority is returning to physical meetings but within current social distancing guidance. Therefore meetings of the Authority and its Committees may take place at venues other than its offices at Aldern House, Bakewell, the venue for a meeting will be specified on the agenda. Also due to current social distancing guidelines there may be limited spaces available for the public at meetings and priority will be given to those who are participating in the meeting. It is intended that the meetings will be audio broadcast and available live on the Authority's website.

This meeting will take place at the Palace Hotel, Buxton. 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

Please note there is no refreshment provision available

To: Members of National Park Authority:

Chair: Cllr A McCloy

Deputy Chair:

Mr J W Berresford
Cllr P Brady
Cllr C Farrell
Cllr C Greaves
Prof J Haddock-Fraser
Ms A Harling
Cllr Mrs G Heath
Cllr I Huddleston
Cllr D Murphy
Cllr V Priestley
Cllr S. Saeed
Mr K Smith
Cllr D Taylor
Cllr J Wharmby
Cllr B Woods

Cllr W Armitage
Cllr D Chapman
Cllr C Furness
Cllr A Gregory
Mr Z Hamid
Cllr A Hart
Mr R Helliwell
Cllr C McLaren
Cllr Mrs K Potter
Cllr K Richardson
Miss L Slack
Cllr P Tapping
Mrs C Waller
Ms Y Witter

Constituent Authorities
Secretary of State for the Environment
Natural England



Committee Date:

Item Number:

Application No:

Grid Reference:

Title: Palace Hotel,
Buxton



**PEAK
DISTRICT**
NATIONAL
PARK

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MINUTES

Meeting: **National Park Authority**

Date: Friday 12 November 2021 at 10.00 am

Venue: The Octagon, Pavilion Gardens, St John's Road, Buxton, Derbyshire, SK17 6BE

Chair: Cllr A McCloy

Present: Mr J W Berresford, Cllr P Brady, Cllr D Chapman, Cllr C Farrell, Cllr C Furness, Cllr A Gregory, Prof J Haddock-Fraser, Mr Z Hamid, Cllr A Hart, Cllr Mrs G Heath, Mr R Helliwell, Cllr I Huddleston, Cllr C McLaren, Cllr D Murphy, Cllr V Priestley, Miss L Slack, Mr K Smith, Cllr P Tapping and Ms Y Witter.

Apologies for absence: Cllr W Armitage, Cllr C Greaves, Ms A Harling, Cllr Mrs K Potter, Cllr K Richardson, Cllr S. Saeed, Cllr D Taylor, Mrs C Waller, Cllr J Wharmby and Cllr B Woods.

72/21 ROLL CALL OF MEMBERS PRESENT, APOLOGIES FOR ABSENCE AND MEMBERS' DECLARATIONS OF INTEREST

Item 7

Members had received several emails in support of the Foolow Community and declared an interest as the Peak District National Park Authority owned the land which was the subject of the report.

Item 13

Cllr McLaren, Mr Hamid and Cllr McCloy declared a prejudicial interest as Trustees of the Peak District National Park Foundation and would leave the room during this item.

73/21 MINUTES OF PREVIOUS MEETING ON 3RD SEPTEMBER 2021

The minutes of the last meeting of the National Park Authority meeting on 3 September 2021 were approved as a correct record.

74/21 URGENT BUSINESS

There was no urgent business.

75/21 PUBLIC PARTICIPATION

Five members of the public had registered to speak to the Authority Meeting.

76/21 AUTHORITY CHAIR'S REPORT

The Chair provided a verbal update to the Authority. COP26 and Climate Change is very much in the news and the Chair highlighted the Chief Executive's report and an email sent to Members by the Chair in October 2021. The 15 UK National Parks have issued a climate emergency response statement which had been circulated. National Parks and protected areas around the world have joined together to issue a joint statement on the climate change and biodiversity crisis which had also been circulated to Members, with the work highlighting opportunities as well as risks posed by the current issues.

COP26 has also been used as an opportunity to launch Net Zero with Nature, an initiative involving all 15 UK National Parks, links had been shared to the National Parks UK website. Government have shown interest in the initiative and this may enable National Parks to potentially realise their ambition with this support.

The Chair updated the meeting on an anticipated delay to Defra's consultation response to the Landscape Review, which is now not likely until the end of the year. A discussion with Members will take place as soon as possible after it is available.

RESOLVED:

To note the report.

77/21 CHIEF EXECUTIVE'S REPORT (SLF)

The Chief Executive's report gave updates on the following:

- Actions following COP26 – UK National Parks net zero with nature initiatives launched including Climate Leadership, Revere investing in natural capital and collaborative restoration projects
- Local Nature Recovery Strategy consultation
- Festival 2022
- Return to the workplace

RESOLVED:

To note the report.

78/21 BROSTERFIELD - REPORT ON THE GATEWAY REVIEW UNDERTAKEN ON 1ST NOVEMBER 2021 (CBM)

The report was introduced by the Head of Asset Management. A brief summary of the Authority's previous decisions in relation to the site was given including the decision on 21 February 2021 to sell the land to the community provided they passed two gateways before 1 November 2021, these gateways were:

1. A robust business plan showing how the community would raise the agreed purchase price
2. Evidence that funding was in place to purchase the site by 1 November 2021

Full details of these gateways were set out in the report.

Although Gateway 1 had been met in May 2021 unfortunately Gateway 2 had not been met by the November deadline and therefore the report updated Members on the current position. Only 23% of the agreed purchase price had been pledged. As the second gateway set out in resolution 7/21 had therefore not been passed the report recommended the disposal of the undeveloped site on the open market with the benefit of planning permission for a touring caravan and camping site.

The following spoke under the Authority's Public Participation at meetings scheme:

- Mrs Katie Edwards on behalf of Foolow Wildwood Project Team
- Mr Geoff Nancolas, speaking as an individual
- Ms Lindsay Price, speaking as a resident
- Mr John Youatt, speaking as an individual
- Mr Simon Wills, Chair of Foolow Parish Meeting

The recommendation as set out in the report was moved and seconded.

A proposal to give the community an additional 12 months was put forward and included that a 'spade be put in the ground' to extend the planning permission. It was noted that minor works on the site were being planned as part of the recommendation.

Clarification was sought if the proposal for an extension of time was an amendment to the current motion however as its effect was to negate the motion as moved and seconded this would be required to be voted on. Consideration of the recommendation of the report would take place before considering if this was an amendment.

Members congratulated the Foolow Community on what they had achieved and noted that they would be able to bid for the site on the open market.

Members congratulated Officers on the report and asked how quickly the site was likely to be put on the open market, it was highlighted that the disposal toolkit previously approved by the Authority (and attached as an appendix to the report) needed to be followed.

The Chief Executive reminded Members of the two purposes of the National Park Authority and to take these into consideration when making a decision regarding the recommendation.

The motion, which had been moved and seconded, was voted on and carried.

RESOLVED:

- 1. That there is not sufficient evidence that funding is in place for the Foolow Community to purchase the Authority's site at Brosterfield. The second gateway set out in resolution 7/21 has therefore not been passed and the Authority shall proceed to dispose the undeveloped site on the open market with the benefit of planning permission for a touring caravan and camping site.**
- 2. To discharge the planning pre-conditions, carry out a material operation and proceed with the 'discontinuance order' in the context of the disposal.**

The meeting adjourned for a short break at 11.00am and resumed at 11.15am.

79/21 EXTERNAL AUDIT 2020/21 ANNUAL REPORT

The report was introduced by Tom Greensill of Mazars, the Authority's External Auditors, who thanked the Head of Finance and her team for the work and assistance during the Audit process. James Sutton of Mazars was also present.

It was explained that there was a delay in the final opinion due to extra work around Value for Money (VFM) and fixed assets, the pandemic and general delays to the audit, the level of scrutiny required and resources. However the External Auditor expects to give an unqualified audit opinion on the Authority's 2020/21 financial statements and will also report that the Annual Governance Statement for 2020/21 complies with guidance and anticipates issuing an unqualified VFM conclusion.

It was noted that the increase in fees was due to the increased work required for VFM, as standards have changed, and there was also an increased level of scrutiny required by the Financial Reporting Council (FRC).

RESOLVED:

- 1. To note the External Auditor's report as set out in Appendix 1 of the report.**
- 2. To note the letter of management representation at Appendix A within Appendix 1 of the report which needed to be signed by the Chief Finance Officer.**

80/21 STATEMENT OF ACCOUNTS 2020/21 (JW)

The report, which sought approval for the audited Statement of Accounts for 2020/21, was introduced by the Head of Finance who confirmed that the audit had been completed by our External Auditors as reported elsewhere on the agenda.

A revised Appendix 2 was tabled by the Head of Finance who advised that it listed the amendments made to the draft Accounts following audit recommendations and that these amendments have all been incorporated into the final version of the Accounts which included the reclassification of cycles from Inventories to Property, Plant and Equipment.

RESOLVED:

To approve the audited Statement of Accounts for 2020/21 as set out in Appendix 1 of the report and that the amendments made to the draft accounts, itemised in Appendix 2 of the report, be noted.

81/21 2020/21 ANNUAL GOVERNANCE STATEMENT (AMC)

The report was introduced by the Head of Law who confirmed that no issues had been highlighted by the External Auditors in relation to their assessment of the Annual Governance Statement (AGS) which involved a review of the effectiveness of the Authority's governance arrangements including the systems of internal control. As part of the Authority's continuous improvement approach to governance arrangements issues were identified in the attached action plan which were to be addressed over the coming 12 months.

An amendment was made to recommendation 1 by adding the words “following receipt of the External Auditors Management Representation letter” at the end of the recommendation.

During a routine review of Standing Orders it had been identified that a deputy was required as a matter of good practice for Cllr Huddleston who represents the Authority on the Peak District Local Access Forum (PDLAF). It was agreed to appoint a deputy Member.

It was also noted that the Authority had an Investigatory and Disciplinary Committee but no Members had been appointed to the Committee at the Annual General Meeting. It was proposed to appoint the six Members required, three Secretary of State and three Local Authority Members, to the Committee. Members of the Committee needed to be different Members than those already appointed to the Appeals Panel.

Cllr C Furness had expressed an interest in the PDLAF Deputy role; no further expressions of interest were made so Cllr Furness was agreed as the deputy Member.

Cllr Murphy, Cllr Gregory, Miss Slack, Ms Witter, Cllr Tapping and Cllr Mrs Heath all expressed interest in being Members of the Investigatory and Disciplinary Committee. It was agreed to appoint these Members to the Committee.

The recommendation set out in the report with the agreed amendment and the two extra recommendations, to appoint a deputy to the PDLAF and to appoint 6 Members to the Investigatory and Disciplinary Committee, were moved, seconded, put to the vote and carried.

RESOLVED:

- 1. To approve the audited Annual Governance Statement for 2020/21 for sign off by the Chief Executive Officer and the Chair of the Authority following receipt of the External Auditor’s Management Representation letter.**
- 2. To appoint Cllr C Furness as Deputy Member representing the Authority at the Peak District Local Access Forum until the annual Authority meeting in July 2022.**
- 3. To appoint the following Members to the Investigatory and Disciplinary Committee: Cllr A Gregory, Cllr Mrs G Heath, Cllr D Murphy, Miss L Slack, Cllr P Tapping and Ms Y Witter until the annual Authority meeting in July 2022.**

82/21 ARRANGEMENTS FOR APPOINTMENT OF EXTERNAL AUDITOR (JW)

The Head of Finance introduced the report which gave details of the three options open to the Authority for the future appointment of external auditors and requested Members to approve the preferred option, which was the most cost effective, to opt into the national audit appointment arrangements of Public Sector Audit Appointments for the financial years from 1 April 2023.

The recommendation was moved, seconded, put to the vote and carried.

RESOLVED:

To approve the Peak District National Park Authority opting into the national audit appointment arrangements of Public Sector Audit Appointments (PSAA) for appointment of the Authority's external auditors for five financial years from 1 April 2023 onwards (2023/24 Accounts).

Cllr Huddleston left the meeting room at 11.45am.

83/21 2021-2022 RESERVE ALLOCATIONS (JW)

The Head of Finance introduced the report which followed on from the 2020/21 outturn report approved by the Authority on the 21 May 2021 (Minute number 35/21), and proposes a reallocation of current cash Reserves that were set aside to finance the impact of the coronavirus pandemic. The reallocations would be as follows:

- a) Retain the Covid Reserve at the lower value of £683k;
- b) Re-allocate £275k from the Covid Reserve to the Restructuring Reserve as was approved in principle by Members in the Authority report of 4 September 2020 (Minute number 64/20).
- c) Re-allocate £130k back to the General Reserve to return the balance to £350k.

The Chair congratulated the Finance Team on the care they had taken to keep the Authority in a good place but there were still external uncertainties such as the future Defra settlement and the Landscapes Review.

The recommendation, as set out in the report, was moved, seconded put to the vote and carried.

RESOLVED:

- 1. That £275k of the Covid Reserve is to be re-allocated to the Restructuring Reserve as approved at the Authority meeting on 4 September 2020.**
- 2. That £130k of the Covid Reserve be re-allocated to the General Reserve to return the balance to a minimum of £350k.**

84/21 PEAK DISTRICT NATIONAL PARK FOUNDATION GRANT AGREEMENT AND MOU 1 YEAR EXTENSION (SS)

Cllr A McCloy, Cllr C McLaren and Mr Z Hamid left the meeting during discussion of this item due to a prejudicial interest as Trustees of the Foundation.

The Deputy Chair, Mr Berresford, took the Chair.

The report seeks approval to continue the partnership with the Peak District National Park Foundation, extending the grant agreement and memorandum of understanding (MOU) between the Peak District National Park Authority and the Peak District National Park Foundation for a further year.

The Fundraising Development Manager introduced the report which sought approval to continue support for the Foundation at the same level (£58,700) for the financial year 2022/23 covered by the existing fundraising budget in appendix 1 of the report. This was made up of £45,000 of staff time in kind and £13,700 cash contribution available in a PDNPA cost centre. It was anticipated that a further report would be made within 12 months' time seeking a longer-term partnership with the Foundation for the benefit of the

Peak District National Park. This would allow time for development work to take place on the fundraising strategy and culture, embedding the Foundation as the fundraising vehicle to develop support for the National Park Management Plan outcomes and consider the resources required to do this.

Cllr A Gregory declared an interest in the item as he had been appointed as a reserve trustee by the Authority.

In response to Members' queries the Chief Executive stated that over the next 6 months Officers would be reviewing the whole level of support from the Authority to the Foundation including looking at the whole fundraising strategy and how the Foundation fits into this, so it was recommended to approve for only one year extension at present.

The recommendations, as set out in the report, were moved, seconded, put to the vote and carried.

RESOLVED:

- 1. To approve a one-year extension to the grant agreement and Memorandum of Understanding to March 2023, providing staff resources to manage and develop the charity, embedding the Foundation across the Authority to support Management Plan outcomes.**
- 2. To note the fundraising strategy development and the key role of the Foundation as the brand and vehicle for delivering the strategy.**
- 3. To note the progress of the Peak District National Park Foundation in its first two years.**

Cllr McCloy, Cllr McLaren and Mr Hamid re-joined the meeting and Cllr McCloy retook the Chair.

85/21 ANNUAL REPORT ON MEMBER LEARNING AND DEVELOPMENT (JC/RC)

The Democratic Services Manager introduced the report which set out the Member Learning and Development Framework and the proposals for the next annual programme of Member learning and development events for January to December 2022.

In response to Members' queries Officers responded as follows:

- There would be more engagement of Members in the development of the Local Plan and there would be a discussion on the Local Plan at the Members' Forum on 26 November 2021. It was also being considered how best to share the minutes of the Local Plan Steering Group with all Members.
- The ELMS learning system had been launched with Members and all Members were encouraged to complete the Equality and Diversity training module as this would also help ensure the system worked for them.
- Members were encouraged to have a personal development plan and as they are individual and personal they will highlight different issues and learning opportunities for different Members. It was agreed that the Chair would look at the current personal development plan process with the Member Champion for Learning and Development.

The recommendations, as set out in the report, were moved, seconded, put to the vote and carried.

RESOLVED:

- 1. To agree the Member Learning and Development Framework (Appendix 1 of the report) and the events programme for January to December 2022 as set out in Appendix 2 of the report.**
- 2. To continue to record Member learning and development activities in terms of hours and include personal learning and development by Members outside of events organised by the Authority, with the target of 20 hours per Member in every 12 months.**

86/21 2021/22 QUARTER 2 CORPORATE PERFORMANCE REPORT (A91941/HW)

As the Head of Information and Performance Management was unable to attend the meeting the Chief Executive introduced the report. The report provided Members with monitoring information for the end of Quarter 2 2021/22 (July to September 2020) to review performance against the third year of the Authority's 2019-24 Corporate Strategy. The next report would be made at the end of Quarter 4.

Members' comments and concerns regarding KPI 2b were noted and it was also noted that National Park Management Plan & Corporate Strategy Working Group were looking at simplifying commentary in the next Corporate Strategy.

The Chair thanked Miss Slack and Ms Witter for their input into the Equality, Diversity and Inclusion Working Group, it was much appreciated.

It was noted that the Asset Management Plan was to be aligned with the timescale for the Medium Term Financial Plan so further action would be in the next financial year – 2022/23.

The recommendations as set out in the report were moved, seconded, put to the vote and carried.

Cllr Hart and Professor Haddock-Fraser left the meeting during consideration of this matter and on their return did not take part in the discussion or voting.

RESOLVED:

- 1. To review the Quarter 2 performance report, given in Appendix 1 of the report, and any actions to address issues agreed.**
- 2. To review the Quarter 2 corporate risk register given in Appendix 2 of the report and the status of risks accepted.**
- 3. To note the status of complaints, Freedom of Information and Environmental Information Regulations requests, given in Appendix 3 of the report.**

87/21 EXEMPT INFORMATION S100(A) LOCAL GOVERNMENT ACT 1972

RESOLVED:

That the public be excluded from the meeting during consideration of agenda item 18 to avoid the disclosure of Exempt Information under S100 (A) (4) Local Government Act 1972, Schedule 12A, paragraph 3 'information relating to the financial or business affairs of any particular person (including the Authority holding that information).

88/21 EXEMPT MINUTES OF THE MEETING HELD ON 3RD SEPTEMBER 2021

The exempt minutes of the meeting held on 3 September 2021 were approved as a correct record.

The meeting ended at 12.45pm.

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6. **CHIEF EXECUTIVE'S REPORT (SLF)**

1. **Purpose of the report**

To up-date Members of key items since the previous Authority meeting on 12th November 2021.

2. **Recommendation**

1. **For Members to note the report**

3. **Key Items**

Government response to the Landscapes Review published: On 15 January the Government published its response to the Landscapes Review report 2021. There will be a 12 week consultation on a number of areas of the Government response and we have been assured that National Park Authorities will be engaged throughout the process. The full response can be seen at Appendix 1 a Question & Answer sheet (Appendix 2) and the press release associated with it at Appendix 3. National Parks England response to the publication can be seen at Appendix 4

In summary, there is nothing hugely contentious in the government announcement and it is supportive of the role protected landscapes play for the nation on climate change, nature recovery and the wellbeing of society. There is very limited new money coming our way however to deliver, and so while we welcome the recognition of our role as a beacon for the nation, we are mindful of the importance of collaboration with others if we are to achieve this and what we could achieve if we had the right resources.

Performance management – Q3 exceptions: At the Authority meeting in November 2020 it was confirmed that future performance monitoring will be presented to Members twice a year - at 6 months into the financial year (end of quarter 2) and the end of the financial year (end of quarter 4). Members were reassured this will not affect Member scrutiny of Authority performance because the KPIs, strategic interventions and corporate risk register will continue to be monitored quarterly by the Management Team and any significant changes will be reported to Members within this Chief Executive's update report to the Authority at Quarters 1 and 3. I have reviewed, with the Management Team, the quarter 3 progress and below are the key strategic areas of concern for reporting to Members:

There are four new strategic concerns raised:

- Possible impact of Covid is still a risk. All service areas have reviewed their business critical activities against a worst case scenario of 25% of their work force off sick due to Covid. Management Team have identified mitigation measures that would be put in should this scenario potentially impact business critical activities. The most likely impact should this scenario occur is an impact on non-business critical activities which would need to be paused or slowed to ensure we maintain our business critical activities.
- Farming in Protected Landscapes (FiPL) Programme revised 2021/22 project funding of £475,000 not being spent by 31 March 2022 and resulting reputational risk for the Authority. The mitigation is regular reporting of spend to the FiPL panel, work by the farm advisers to highlight the opportunity to farmers and land managers and regular liaison with Defra.
- South West Peak Landscape Partnership Programme (SWPLP) not completing all deliverables to ensure that all the National Lottery Heritage Funding is secured and that the legacy including a successor programme may not be secured
- Ongoing strain on our Planning Service capacity owing to staff sickness, departures and high volumes of planning applications and pre-application enquiries

- Increasing risks on delivery of winter works by the Moors for the Future team

Four strategic interventions are raised as exceptions:

- Developing a methodology for strategic sustainable landscape monitoring (part of KPI 2a), which has been affected by the introduction of Farming in Protected Landscapes and the need to develop one nature recovery plan for the Peak District.
- Developing and adopting the remaining Conservation Area appraisals (part of KPI 10), which has been affected by Covid-19 and increased numbers of planning applications.
- Implement Asset Management Plan (part of KPI 23), which has been affected by vacancies in the service, delays with restructure and sickness absence.
- Further implementation of an online procurement portal (part of KPI 26), which has been impacted by the need to work from home preventing face-to-face training. However procurement continues in line with our Standing Orders.

Three corporate risks are raised as exceptions:

- Failure to develop nature recovery networks (Amber)
- Area of NP land safeguarded in environmental land management schemes (Red)
- Farming in Protected Landscapes Fund (Red)

Return to the workplace – For staff who are office based, October 2021 marked a return to the office and workplace in a more structured way since March 2020 following blended working principles agreed by the Management Team, in consultation with Staff Committee and Unison. In December, as part of our approach to continuing to respond to any further government guidance, we paused these principles with the advice from the Government for employees to work from home where they can. This meant we paused the planning of our approach to Aldern House reopening to the public, and currently this is operating on a by appointment only basis, ensuring we take a cautious approach to this over the winter months. However the Blended Working Group are re-visiting our approach given the recent lifting, by the Government, of the Work from Home instruction.

Appendices

Appendix 1 – Government Response to the Landscapes Review

Appendix 2 – Question & Answer Sheet

Appendix 3 – Defra Press Release

Appendix 4 – National Parks England Response to the Landscape Review

Report Author, Job Title and Publication Date

Sarah Fowler, Chief Executive, 27 January 2022



Department
for Environment
Food & Rural Affairs

Government Response to the Landscapes Review

Date: January 2022

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Any enquiries regarding this publication should be sent to us at
Landscapesconsultation@defra.gov.uk

www.gov.uk/defra

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Foreword

The last two years have demonstrated the benefit that people get from having access to nature-rich landscapes. Our National Parks and Areas of Outstanding Natural Beauty have been a vital resource for so many of us, but it remains the case that they can be hard to reach. As we embark on our mission to level-up every part of the country, I want us to ask what more we can do to bring nature and people closer together.

I am enormously grateful to Julian Glover and the panel for their report, which comprehensively reviewed our National Parks and AONBs. We have an opportunity to create a new chapter for our protected landscapes, and this response will set out how we plan to do so. The work that we are taking forward is going to contribute to our commitment to protect 30% of our land by 2030 and boost biodiversity, as well as designating more areas of the country for their natural beauty.

Our protected landscapes must also be integrated into the design and development of Local Nature Recovery Strategies and our Environmental Land Management schemes. We have already launched our Farming in Protected Landscapes programme to help farmers based in National Parks or AONBs to make improvements to the natural environment and improve public access on their land.

Alongside boosting biodiversity, improving public access to our protected landscapes is a priority. Our levelling up agenda is about addressing inequality, and I am determined that our protected landscapes will be accessible to all, improve mental and physical wellbeing and support local economies. We will encourage sustainable tourism and national engagement programmes, supported by expanded ranger services and improved rural transport. Equally, where people don't respect our protected landscapes, we will ensure strengthened enforcement powers address antisocial behaviour and damage.

Our protected landscapes must be managed more consistently, but never at the expense of local input. What works for Dartmoor won't necessarily work for the Lake District – but they do share national challenges like climate change. That is why we will establish a new national landscapes partnership to coordinate the work of existing organisations at a national level but maintaining current levels of local input.

Working with National Parks and AONBs in the coming years, we will ensure our protected landscapes boost biodiversity; recognise their role in delivering Net Zero, protect us from flooding; store carbon; help communities adapt to the effects of climate change; improve the quality of people's lives and support rural economies.

Julian Glover's review highlighted a series of challenges facing our National Parks and AONBs but recognised that there are solutions and – most importantly – opportunities.

The package of measures set out in this response will rise to the challenge before us and leave our protected landscapes in a better condition for future generations.



Richard Benyon.

The Rt Hon Lord Benyon

Parliamentary Under Secretary of State at the Department
for Environment, Food and Rural Affairs

Introduction

All of England's landscapes are important, but National Parks and Areas of Outstanding Natural Beauty (AONBs) are our most iconic and beautiful places. Based on their geology and history, these characteristic landscapes contain swathes of ancient woodland, deep peat and grassland, and many of our most threatened species such as the red squirrel, curlew and water vole. Protected landscapes represent our shared heritage and national identity, and are home to many of our rural communities and businesses. They also support our nation's health and wellbeing as unique places to experience natural beauty and tranquillity.

Since our statutory system of protected landscapes was first established by Parliament in 1949, our society and the challenges it faces has changed. We must address climate change, biodiversity loss and increasing public health issues such as mental health and obesity. At the same time, our understanding of the value of the natural environment has vastly improved, particularly the public services it provides. That is why the government commissioned the Landscapes Review.

Reflecting on all these changes and the comprehensive findings of the review, we feel this is a moment to redefine the role that protected landscapes should play in today's society. Our vision for protected landscapes is:

'A coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy. Protected landscapes will support thriving local communities and economies, improve our public health and wellbeing, drive forward nature recovery, and build our resilience to climate change.'

The review represents an exciting new chapter in the history of our nation's most special places. The document sets out the government's response to the findings of the review and our proposed approach to achieving this vision for protected landscapes. It will involve changes to the way that we work together to manage and protect these places to ensure future generations inherit our protected landscapes in a better state than we found them.

The review

Julian Glover and the panel carried out a comprehensive review of our protected landscapes and made 27 wide-ranging proposals; this document sets out the government response to those proposals. We reference proposal numbers from the [review](#) where relevant.

Implementing our response to some proposals will involve changes to primary legislation. We are consulting on those changes and include details of how to respond. Annex A – Consultation There is also an opportunity for people to comment on all other aspects of the

response. We are keen to hear from a broad range of society who are interested in the future of our protected landscapes.

Terminology

‘Protected landscapes’: For the purposes of this document, the areas designated as National Parks, the Broads, and Areas of Outstanding Natural Beauty (AONBs) will be referred to collectively as ‘protected landscapes’. In this document, references to ‘National Parks’ include the Broads.

‘Lead partners’: Responsibility for day-to-day management of these areas is led by different lead partners and organisations including National Park Authorities, the Broads Authority, and AONB teams. For the purposes of this document, these are referred to collectively as our ‘lead partners’.

‘AONB teams’: For the purposes of this document, AONB Conservation Boards and AONB Partnerships hosted by local authorities will be referred to collectively as AONB teams.

Since publication of the review

A huge increase in visitors during the Coronavirus pandemic demonstrated the vital role protected landscapes have in supporting the nation’s health and wellbeing. However, this experience also presented significant visitor management challenges, at times putting a huge strain on our lead partners and communities. This demonstrated that we do not currently have sufficient resources in place to fully meet public demand for our protected landscapes, particularly if we are to attract new and larger audiences.

Nature and climate

The Prime Minister has committed to [protect 30% of UK land for nature by 2030](#) (30 by 30), setting out our intention and ambition to deliver domestically on the 30 by 30 global goal we are advocating for under the Convention on Biological Diversity’s (CBD) post-2020 Global Biodiversity Framework. Despite being only one quarter of land cover, protected landscapes are home to nearly half of all priority habitats in England, including many of our most important sites for nature. Achieving 30 by 30 will rely on improvements in how these areas are protected and managed for nature recovery, as set out in this response to the review and the Nature Recovery Green Paper.

Natural England has set out an ambitious new [landscape designation programme](#), helping us to implement Proposals 20-22. This includes considering the creation of two new AONBs in the Yorkshire Wolds and Cheshire Sandstone Ridge, and extensions to the

Surrey Hills and Chilterns AONBs. The new programme, which includes undertaking an All-England Assessment, is exploring new approaches to improve landscapes for people and nature, particularly in and around towns and cities. It will enable a more collaborative process to designate new National Parks and AONBs.

We have launched the [Farming in Protected Landscapes](#) (FiPL) programme to help our lead partners forge new or stronger relationships with farmers to deliver projects that support nature recovery, mitigate climate change, improve access, and support sustainable farm businesses. The programme is part of Defra's [Agricultural Transition Plan](#) and should help shape the potential role that protected landscapes could have in the agricultural transition.

We have published our Net Zero Strategy which sets our ambition to use our land more effectively to tackle climate change, in which protected landscapes have a key role. The [England Trees Action Plan](#) launched in May 2021 committed to treble tree planting rates in England by the end of this Parliament. This objective is supported by the Nature for Climate Fund worth more than £750 million across this parliament. As part of this, we are working with landowners, local authorities, and local communities to fund multiple large afforestation projects contributing to the aim of Proposal 20 that local people should be supported to create more wooded, accessible landscapes. This includes at least three new community forests located in areas of social and tree canopy deprivation and funding for planting in the North and Midlands through the Northern Forest and National Forest Company. The complementary England Peat Action Plan set out our government's long-term vision for the management, protection and restoration of our peatlands and committed to immediately fund at least 35,000 ha of peatland restoration by 2025. This includes a £2.7 million investment through the Nature for Climate Peatland Grant Scheme into the Great North Bog, a landscape approach to restoration across nearly 7,000km² of upland peat in the protected landscapes of northern England.

The 2021 Spending Review also announced a new government target to leverage at least £500 million a year for nature's recovery by 2027 and more than £1 billion a year by 2030. Designated landscapes have a major role to play in achieving, and benefitting from, this target.

Our lead partners have collectively pledged to address climate change and biodiversity loss at a national level. National Parks England (NPE) has set clear targets for climate mitigation and nature recovery through their [delivery plans](#). Led by the National Association for AONBs, AONB teams are working to deliver the [Colchester Declaration](#), which includes targets for habitat restoration and species recovery.

People and places

The review highlighted the disparities in society's access to nature, and its importance to wellbeing and reducing health inequalities, which was made much more apparent during the pandemic. The government is proud to support more diverse and inclusive engagement, such as the [Generation Green programme](#), through our [Green Recovery Challenge Fund](#). The government has also launched [green social prescribing pilots](#) at several sites in or near protected landscapes, which will test how connecting people with nature can improve mental wellbeing and contribute to our implementation of Proposal 10.

NPE has recently published their 'Landscapes for Everyone' [delivery plan](#), which outlines their commitment to enabling underrepresented communities to discover protected landscapes. We have already seen innovative projects at several National Parks including South Downs' bespoke [Health and Wellbeing strategy](#), Exmoor's Families United in Nature Project, and North York Moors' lottery-funded [Explorer Club](#).

Across the country, AONB teams are working to support constructive, creative engagement between the public and the landscapes, through for instance North Pennines AONB and Yorkshire Dale lottery-funded partnership on the [Tees-Swale: naturally connected programme](#), Kent Downs AONB's work on informing [enhanced access](#) and the Chilterns Conservation Board's [Chalk, Cherries and Chairs](#) initiative. Additionally, as part of their commitment to reach a more diverse range of people, the UK's AONBs have worked with the Ginkgo Prize, the world's largest eco-poetry prize, to establish a [Best Poem of Landscape](#) category.

Chapter 1: A more coherent national network

The review highlighted the opportunity to bring protected landscapes together to achieve ‘more than the sum of their parts’ by unifying the current system, providing more consistent national leadership, and setting a clear mission. These fundamental changes will underpin our ability to achieve our national vision for ‘a coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy’.

Strengthened AONBs

The review recognised the vast majority of AONBs are indistinguishable from National Parks and are just as important for people and nature but lack equivalent recognition in law or support in resources. Proposal 24 therefore called for “AONBs strengthened with new purposes, powers and resources, renamed as National Landscapes”. The package of reformed purposes and resources set out in this response are relevant to all protected landscapes and lead partners. However, we agree that action needs to be a priority in AONBs in order to unlock their full potential in achieving our vision alongside our National Parks.

We agree that the national significance of our AONBs should be reflected in their name. We are currently working with the National Association for AONBs to identify the best way to exemplify the values which underpin this renewed family of protected landscapes in their branding. As part of that work, we are testing the proposal to rename AONBs as ‘National Landscapes’. Any name change must represent a step change for AONB teams with the ambitious new title encompassing new purposes delivered by skilled teams, sustainable funding and robust governance. Pulled together as a package these proposals have the potential to deliver a transformational approach to AONB leadership and management.

Strategic direction

We agree with the finding of the review that we need stronger governance to provide national leadership and coordination, and to ensure that our lead partners in National Parks and AONBs collaborate much more effectively to achieve our vision. While Proposal 25 suggested creating a new ‘National Landscapes Service’, we do not believe that this should be a new public body, as this will simply create another organisation within an already complex governance system, at the cost of great public expense and disruption to the important work of our lead partners. Having carefully considered this proposal, we believe that national governance reforms should be focussed on ensuring that our existing partners work together more effectively at a national level.

We will therefore establish a new national landscapes partnership to build on the existing collaboration between National Parks England and the National Association for AONBs, complemented by roles for the National Trails and National Parks Partnerships. This partnership should:

- generate additional private income through green finance initiatives and joint funding bids;
- champion protected landscapes and run national campaigns, such as promoting tourism;
- develop strategic partnerships and programmes with a particular focus on commercial partners;
- create opportunities to provide training and development, and
- share knowledge and expertise to build capacity across the protected landscapes family.

We are working with partners to develop the structure of this new partnership over the coming months.

Defra will provide clearer strategic direction for protected landscapes through a new national landscape strategy. This will set out a clear national framework to guide the development of plans and programmes by the national landscapes partnership and help to inform the development of local management plans. This is explained further in Chapters 2 and 4.

Natural England's role as our statutory advisor on England's landscapes will be reinvigorated to support national landscapes to better recover nature and provide good quality access to it. It will advise all relevant parts of government, at the local and national levels, on the appropriate management and protection of protected landscapes. It will also have a clear role in monitoring progress of delivering the national landscapes strategy through local management plans and delivery. This is explained in Chapters 2 and 4.

A unified mission

The review highlighted the fundamental importance of the statutory purposes of protected landscapes in shaping the decisions that follow, including government policy, funding, and decision-making. Chapters 2 and 3 set out the specific changes to the statutory purposes that we intend to make to ensure they are aligned with our vision for protected landscapes. Given that National Parks and AONBs are equally important parts of our vision, we will also ensure that their statutory purposes are more closely aligned. This will bring greater consistency in how these areas are protected and managed.

We will obviously need to consider the effects of any changes to statutory purposes separately for the Broads, which has a third statutory purpose in relation to navigation.

Chapter 2: Nature and climate

Protected landscapes have enormous potential to deliver on our environmental ambitions, including the 25 Year Environment Plan goals, Environment Act 2021 forthcoming targets, and reaching net zero. Despite being less than one-quarter of land cover, protected landscapes are home to nearly half of all priority habitats in England, including 60% of deep peat, 34% of broadleaf woodland and nearly 88% of heather and acid grassland habitats¹.

Climate change may mean that our protected landscapes look different in the future. This challenge requires us to consider the need to manage them differently, not just to conserve and enhance them, but to also play new roles in helping to both reduce our net emissions and enable nature and our communities to adapt to the unavoidable effects of climate change. The government's Net Zero strategy set out the importance of making the most of our natural resources to tackle climate change, including better use of our land to deliver nature-based solutions.

Despite the considerable efforts of our lead partners, the review highlighted that nature has been in long-term decline in our protected landscapes, and they are not contributing as they could to restore nature and respond to climate change. More action is clearly needed to make these special places bigger, better and more joined up spaces for nature, and to help tackle climate change and adapt to its impacts.

This chapter sets out how we will put our protected landscapes at the heart of delivering our nature recovery and climate policies and show leadership on the international stage for how this can be achieved. Our approach will ensure our protected landscapes contribute to our vision to 'drive forward nature recovery, and build our resilience to climate change'.

The Nature Recovery Network and 30 by 30

The Nature Recovery Network aims to join up and make space for nature across England. Given their spatial scale, and track records in planning and delivering landscape-scale restoration projects, protected landscapes could play a particularly important role in the delivery of the Nature Recovery Network (Proposal 4).

Local Nature Recovery Strategies (LNRs) will provide the underpinning framework for the Nature Recovery Network and will provide the focus for a broad range of funding and

¹ Natural England data

delivery activities. We will explore ways for protected landscapes to support responsible authorities in preparing and delivering LNRs, utilising their expertise to highlight landscape-scale opportunities within protected landscapes and embedding links with their statutory management plans so they align. This role will help to ensure neighbouring LNRs set out coherent, ambitious strategies for nature recovery across whole landscapes that cross administrative boundaries.

Our Nature Recovery Green Paper will set out how we aim to achieve our goal to protect 30% of our land for nature by 2030. At present, under their current statutory purposes, level of protection and management, protected landscapes cannot be said to contribute towards 30 by 30 in their entirety, and they must do more to drive the recovery of nature. Applying our framework for what should count to 30 by 30 as set out in our Nature Recovery Green Paper will allow us to identify and prioritise where reform and investment are most needed in our protected landscapes. However, this will also require lead partners and their local partnerships to step up to this challenge. We want all protected landscapes to have clear visions for nature recovery but these must also collectively make a major contribution to national nature recovery outcomes. By strengthening the first purpose for nature, supporting stronger protections and management and monitoring progress, we will ensure these areas can contribute to this ambitious commitment for biodiversity and our wider nature recovery ambitions.

A stronger mission for nature recovery

We agree with Proposal 1 that the current statutory purpose to ‘conserve and enhance’ is not strong enough. This does not reflect that many of our existing landscapes are now badly degraded, or the urgency of the fight to tackle biodiversity loss. We will therefore strengthen this purpose, making it clear that we need to actively recover nature in these areas, rather than simply conserve what remains. A strengthened purpose for nature would also be more closely aligned with national policy objectives, increase the weight given to nature recovery by public bodies, and reinforce that these areas should contribute to our target to halt the decline in species abundance by 2030 and our 30 by 30 commitment.

We support the intention of the wording proposed by the panel. We propose to amend the current statutory purpose so that:

- A core function of protected landscapes should be to drive nature recovery
- A revised purpose should be more specific with regards to nature outcomes and explicitly mention biodiversity
- The principle of natural capital should also be included to capture the societal value of nature in our protected landscapes and encompass a broader range of ecosystem services.

As explained in Chapter 1, we also intend to create a single set of statutory purposes for AONB teams and National Park Authorities, providing a more consistent and unified statutory framework for all protected landscapes. We will carefully consider any changes to this statutory purpose for the Broads, which has a third statutory purpose in relation to navigation, while the ‘Sandford Principle’² does not apply.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

Setting ambition and monitoring progress

We agree with proposals 2 and 3 that improving our monitoring and reporting in protected landscapes will help us to understand the state of nature and prioritise action towards our desired environmental outcomes.

By January 2023, new ambitious outcomes will be agreed for the role of protected landscapes in delivering on the government’s goals for nature recovery and climate, aligned with the revised 25 Year Environment Plan and interim environmental targets under the Environment Act 2021 and the Net Zero Strategy. Natural England will monitor and evaluate progress against the key indicators and outcomes and will also support individual protected landscapes to translate these targets into their management plans.

We are developing the Natural Capital and Ecosystem Assessment (NCEA), which will provide data on habitats, natural capital, and ecosystem function. This will help to monitor progress against agreed outcomes. Combining earth observation technology and data science with professional field surveys and citizen science, this tool will inform the priorities of protected landscapes, including flood risk reduction, boosts to wildlife, water air quality improvements, and opportunities for biodiversity net gain. Ambitious goals to increase carbon sequestration, together with improved natural capital reporting, should be embedded in all protected landscapes’ management plans. Management plans should also set out their local response to climate adaptation, managing long-term landscape change to increase the resilience of local communities and ecosystems.

² As per the Environment Act 1995, the Sandford Principle states that, where there is a conflict between the statutory purposes of national parks, any relevant authority "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".

Agricultural transition

Proposal 5 makes the case for the special significance of protected landscapes to be reflected in environmental land management schemes. Recognising the distinct status of protected landscapes as part of the Agricultural Transition Plan, the FiPL programme has already demonstrated the value of the knowledge and expertise our lead partners can offer when developing and delivering agri-environment schemes.

We will build on lessons from the FiPL programme to develop the new environmental land management schemes. We are considering a number of options for how the special status of protected landscapes can be reflected in environmental land management schemes' design and delivery. These could include:

- Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.
- Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.
- Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.
- Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.
- Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.

Defra will be working closely with partners and stakeholders to develop these options further to ensure we settle on the right one for all parties, and there will be more opportunities to feed into environmental land management schemes design as it progresses.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

Chapter 3: People and place

The review highlighted the opportunities for protected landscapes to deliver for everyone so that the benefits for health and wellbeing are available to all parts of society especially considering the need to reduce health inequalities. Changes are needed to improve access and support local economies in order to achieve our vision for protected landscapes to ‘support thriving local communities and economies, improve our public health and wellbeing’.

Landscapes for everyone

The review included proposals to increase engagement with all parts of society, particularly younger and more diverse audiences (proposals 8 and 9), through expanded volunteering (proposal 11), supported by increased rangers (proposal 13). Programmes such as [Generation Green](#) demonstrate that national-scale partnerships and coordinated collaboration can augment what our lead partners are already doing so well. We are therefore aiming to establish a national coordination function through the new national landscapes partnership that can work with our lead partners to enhance and expand community engagement through national strategic partnerships and collaborative campaigns. This could expand their collective capacity to plan and promote events, programmes and volunteering opportunities that focus on connecting young people with nature, increasing the ethnic and socio-economic diversity of visitors, and aiding people with disabilities to enjoy our protected landscapes.

We will also consider using the powers under the Agriculture Act and resources under the Farming in Protected Landscapes Fund to support or reward landowners for offering enhanced access to their land in some circumstances.

We are also actively developing opportunities to work across government to strengthen the role that protected landscapes can play in supporting the country’s health, wellbeing, and education. We are seeking ways to:

- Work strategically with the Probation Service’s community payback scheme
- Support capacity building in schools to engage with nature
- Enable protected landscapes to deliver for green social prescribing provision

Additionally, we recognise that rangers are fundamental to enhancing and harnessing the benefits that protected landscapes offer. We will seek ways to increase the number of rangers engaging with people in protected landscapes.

A stronger mission for connecting people and places

We agree with proposal 7, that a strengthened second statutory purpose for National Park Authorities would clarify and reinvigorate our lead partners' ambition to connect all parts of society with our protected landscapes. As explained in Chapter 1, we intend to create a single set of statutory purposes for AONB teams and National Parks Authorities, providing a more consistent and unified statutory framework for all protected landscapes. We therefore agree that this strengthened purpose should be extended to AONBs teams.

We support the intention of the wording proposed by the panel. We propose to amend the current statutory purpose to:

- Highlight the need to improve opportunities and remove barriers to access for all parts of society
- Clearly reference public health and wellbeing as an outcome
- Take a more active role in supporting access than just promoting opportunities

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

Supporting local communities

Proposal 17 suggested creating a new statutory purpose to foster the economic and community vitality of their area. However National Park Authorities, AONB Conservation Boards and the Broads Authority already have a statutory duty that relates to the economic and social well-being of local communities. Local authorities hosting AONB Partnerships also have existing statutory responsibilities to consider the rural economy. We also consider that there are risks that introducing a third purpose could dilute the importance of the existing purposes and have unintended outcomes such as impacts on future designations.

We recognise the importance of supporting rural communities and share the panel's desire to support vibrant local communities, however we do not consider that a new statutory purpose is the appropriate policy to achieve that objective. Instead, we will support our lead partners to discharge their existing duties effectively and consistently through government guidance and sharing best practice. The government will also support local communities through programmes such as the FiPL programme, which is helping farmers capitalise on the many social and financial benefits that the Visitor Economy generates in protected landscapes.

Sustainable transport

In relation to proposal 19, the government supports the Lake District National Park Authority and Cumbria County Council developing new sustainable ways to access the National Park that may transform public transport in the area and become a blueprint for other protected landscapes.

Many protected landscapes require bespoke transport arrangements. For example, Peak District National Park Authority, with South Yorkshire Combined Authority and Derbyshire County Council, are to consider new types of Demand Responsive Transport (DRT) services. Local authorities should consider opportunities such as these as part of their wider transport plans. The government is updating guidance around Local Transport Plans, which will reinforce the need for local authorities to consult appropriately with key stakeholders including National Park Authorities and Destination Management Organisations (DMOs). Our proposals to strengthen the statutory purposes of protected landscapes and strengthen the duty of regard (Chapter 4) should increase the weight local authorities give to supporting local rural communities and the public's enjoyment of protected landscapes through their transport plans.

Open access land

Proposal 16 recommends expanding open access rights to provide additional recreational opportunities. We aim to review the open access maps to clarify rights and inform any further consideration of expanding open access rights. We will also continue to pay for heritage, access and engagement through our existing schemes and we will consider how to maintain investment in these areas as part of future schemes. In parallel, we will also explore the barriers that may exist to the provision of permissive access by landowners and seek to remedy these.

National Trails

We agree with proposal 15 that National Trails should be more joined up with our protected landscapes, particularly in the planning and delivery of initiatives to improve access to the natural environment. A new charity is being formed as a single, strategic body for all National Trails. This will unify and strengthen their voice and help to integrate the work of our lead partners. We are exploring the potential to include the National Trails charity as a member of the new national landscapes partnership (see Chapter 1).

Sustainable tourism

The government's [Tourism Recovery Plan](#) recognises that the government has a role in helping the tourism industry play its part in contributing to the conservation and enhancement of cultural, natural and historic heritage, and avoiding damage to the environment. VisitBritain/VisitEngland are celebrating and sharing sustainable best practice and working with the sector to put the UK's natural environment, including our protected landscapes at the heart of the country's brand proposition. To identify and deliver further ways to help the industry to grow back greener, we have also committed to producing a Sustainable Tourism Plan, working with the wider Visitor Economy sector and VisitBritain/VisitEngland, and will be engaging with representatives from the protected landscapes to help inform that plan.

Managing visitor pressures

Since the review was published, rangers in protected landscapes have observed increased visitor numbers and an increase in anti-social and hostile behaviour. In response, Natural England has revised the [Countryside Code](#), and run a communications campaign to improve people's understanding of the countryside and promote socially and environmentally responsible behaviours. However, providing visitors with clearer information has not been sufficient to fully address these ongoing issues.

We are therefore considering making a greater range of enforcement powers available to National Park Authorities and the Broads Authority to help manage visitor pressures and make National Parks a more pleasant and safe place to live and visit. These are powers to:

- Issue Fixed Penalty Notices for byelaw infringements - this would simplify the process and reduce enforcement costs. Increasing the penalties would also act as a stronger deterrent and provide reassurance to local communities.
- Make Public Space Protection Orders (PSPOs) – this would reduce administration costs where multiple local authorities have jurisdiction across a National Park and ensure there is a consistent approach where PSPOs are deemed necessary to deter genuinely antisocial behaviour. This would only be used following consultation with LAs.
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads – this would help to tackle and deter problems caused by vehicles that could lead to damage to sensitive environments or wildlife and allow National Park Authorities to respond more quickly to emerging traffic issues.

Some country public rights of way and unsealed unclassified roads known as 'green lanes' allow for the legal recreational use of motor vehicles. Whilst many users make use of these rights in a responsible way, we have become increasingly aware of damage and

disturbance caused by excessive use of off-road motor vehicles on some unsealed routes. This can result in impacts on local wildlife, the special qualities of an area e.g., tranquillity, and make the route less accessible for other users such as those on foot, bicycles, horseback, or in vehicles used by disabled people. In protected landscapes, these impacts could undermine the statutory purposes of the area.

We are also aware that these unsealed routes often provide essential vehicular access for local residents and businesses, and recognise that many people enjoy using motor vehicles responsibly on green lanes without causing damage or disturbance. Vulnerable groups such as disabled or elderly people are also likely to be particularly reliant on vehicular access in rural areas including via community transport.

We therefore would like to explore the options available for protecting our green lanes while maintaining most public and private access rights, particularly for residents or businesses. This could be achieved by giving greater discretion for National Park Authorities and local highway authorities to use existing powers to restrict use on a case-by-case basis. Alternatively, the government could consider restricting the use of certain motor vehicles on unsealed roads through legislation, but only if this could carefully balance the needs of all users including motorised vehicle users, horse riders, cyclists and walkers, whilst also protecting private access rights.

We will also continue to work to manage visitor pressures through visitor dispersal. A key objective in the government's Tourism Recovery Plan is for visitor spending to grow year on year in every nation and region of the UK, not only within but beyond the usual tourist 'hotspots' to smaller, lesser-known destinations - including the lesser-visited protected landscapes. For example, we have supported this through many [Discover England Fund](#) projects, which are well suited to meet the renewed interest in outdoor experiences and showcase lesser-known destinations.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

Planning reform

A strong and effective planning system must sustainably balance protections with supporting local communities and economies. This balancing exercise must be carried out differently in protected landscapes, to ensure their statutory purposes and special qualities are meaningfully protected. This involves giving greater weight to their special qualities in planning policies, procedures, and decisions. For example, the recent revision of the [National Planning Policy Framework](#) (NPPF) (2021) clarified that development in the setting of protected landscapes should be sensitively located and designed to avoid or minimise adverse impacts.

As we consider planning reforms, we recognise the special role that protected landscapes hold within the planning system and will continue to explore opportunities for how this role could be developed further. An integral part of reviewing the planning reforms is considering how they align with and support our wider mission to level up the country and regenerate left-behind places.

As part of planning reform, we intend to review the NPPF, and we will further consider how policy for protected landscapes is set out. The Environment Act 2021 will also embed a biodiversity net gain approach into the planning system in England. This new requirement to offset unavoidable impacts of development will create new opportunities to conserve and enhance habitats and ecological networks, including within protected landscapes.

The role of AONB teams in planning

The review highlighted the important role of the National Park Authorities and the Broads Authority in delivering high-quality, sustainable development through effective use of their planning powers. Their local plans have an important role to play in achieving our vision, providing certainty to businesses and communities, offering opportunities to connect habitats and wildlife, and driving action on climate change.

AONB teams also make a valuable contribution to the planning process through a range of tools including evidence gathering and issuing of planning and design advice to inform plan-making and planning applications. This can contribute to the delivery of good quality development in keeping with local character and meeting the AONB teams' purpose. However, the review found that AONB teams do not always have the resources to meaningfully engage with the planning system, and their advice is sometimes given limited weight in planning decisions. Proposal 6 therefore suggested that their role in the planning system should be strengthened.

We recognise that AONB teams can bring substantial evidence and expertise to the planning process, and we wish to seek views on how the AONB teams can achieve better outcomes through the plan-making process.

The review also identified strong support for AONB teams to be granted statutory consultee status for planning applications. Whilst we acknowledge the resource implications this would place on AONB teams, we recognise the benefit of further strengthening their role and are seeking views on this potential change.

For details of how to provide your views on this issue, please see **Annex A – Consultation**.

Permitted Development

The review also highlighted that certain permitted development rights may impact landscape quality, and proposal 6 suggested a review of existing rights.

We recognise that permitted development rights can play an important role in delivering new homes, particularly in rural areas. This benefits householders and businesses. We will continue to monitor the use of permitted development rights in protected landscapes, and identify future opportunities to review their use.

Affordable housing

We share the concerns raised in the review regarding the availability of affordable homes to support sustainable communities in protected landscapes. However, this issue is not unique to protected landscapes, and as such our policy response considers all rural areas.

Existing rural housing associations are already helping to increase the supply of new and affordable homes in protected landscapes. We do not believe that a new, publicly funded housing association specifically for protected landscapes recommended under proposal 18 would be any more effective at targeting the underlying challenges of finding suitable and economically viable small sites in these areas. Indeed, a new housing association could even harm the viability of existing rural housing associations.

We are instead progressing alternative means to deliver suitable housing for local communities in rural areas, including protected landscapes. For example:

- Rural Exception Sites deliver affordable housing in perpetuity to meet local needs in rural areas. When used effectively, these sites can provide vital affordable housing for local communities. We have recently published planning practice guidance to help those involved in the process to bring forward more of these sites in the future;
- Homes England's funding prospectus for the new 2021-26 Affordable Homes Programme continues to support the delivery of rural housing.

Chapter 4: Supporting local delivery

Achieving our vision will rely on effective local delivery, driven and directed by our lead partners, providing local leadership and working within strong local partnerships. While the review praised the excellent work and commitment of our lead partners, it also made some proposals to improve local delivery. This chapter sets out how we will boost local delivery of outcomes through changes to governance, financing and legislation.

Local governance

We need local governance that creates the conditions for consistently high standards of collaboration towards shared strategic priorities but that is flexible enough to adapt to local circumstances. Local governance structures should create a careful balance of democratic accountability, essential skills, and diversity of experience.

National Park Authorities, the Broads Authority and AONB Conservation Boards

Board members bring time, energy and expertise. Despite the passion and commitment of these individuals, the review (proposal 26) found that these boards do not always function as well as they could, sometimes due to the restrictive legislation they operate within. To support boards to deliver their full potential, we are developing a flexible package of statutory and non-statutory measures to achieve the following improvements, which we will develop in consultation with board members.

Improved performance

Setting clear performance standards and agreed expectations will get the best out of board members and deliver better outcomes. This could include a standard role profile, a shared code of conduct, regular skills audits, and improved training. To empower boards to address poor performance, these measures should be supplemented by performance reviews, fixed-term appointments, and a streamlined process for removing underperforming members.

Strengthened local partnerships

We would like to see greater integration of advisory panels into the development and implementation of statutory management plans by providing specialist expertise and ensuring local voices are heard on decisions that impact local communities.

Skilled, diverse and representative boards

We agree that for protected landscapes to benefit all parts of society, their boards must better reflect that society. The review highlighted a need for greater diversity, and we have begun to address this through improvements to the Secretary of State public appointments process. This has significantly increased the proportion of candidates who are female and/or from an ethnic minority background. There is still more to do, and we will continue to embed diversity, equity, and inclusion best practices into our public appointments.

While we are seeing positive change in our national appointments, these comprise a minority of the overall board members. We disagree with proposal 26 that all members be appointed nationally given the important role locally elected members play in giving the boards democratic legitimacy. Instead, we are considering removing the strict legislative requirements for a specific ratio between appointment types. Boards would still need national, parish, and local authority members but they would have more flexibility to balance diversity and expertise with strong democratic oversight in accordance with the needs of their specific area.

Another option would be to introduce a more merit-based approach to local nominations, encouraging local authorities to put forward their best candidates considering similar desirable criteria as Secretary of State appointees. This would retain vital democratic accountability while helping to identify the best local representatives to create engaged, diverse, and appropriately skilled boards.

Improved efficiency

Reducing board sizes would simplify decision-making processes, boost efficiency and follow best practice governance models. Proposal 26 recommended capping boards at 12 members, but this may not be appropriate in areas with large numbers of local authorities. We are already in discussion with a number of National Park Authorities about potential board reductions on a case-by-case basis. Reductions should not be at the expense of the skills, expertise and diversity needed. In cases where a large board is necessary or advantageous, clear guidance on structuring and organization may boost efficiency.

Strategic alignment

Currently, boards select a chair from amongst their members. Proposal 26 suggested that the chair should be appointed by the Secretary of State, in line with Defra's public bodies, which we believe could provide greater continuity, strategic direction, and accountability.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

AONB Partnerships

Although proposal 26 focussed on National Park Authorities the Broads Authority and AONB Conservation Boards, many of the issues highlighted in the review are relevant to

AONB partnerships. Government has less direct influence over governance structures hosted by local authorities, but we want to encourage positive reforms.

Natural England will replace the former Countryside Agency guidance for AONB Partnerships, to set out clear governance principles, processes, and structures that local authorities would be expected to follow. This guidance will be flexible enough to be adapted to local circumstances but would aim to improve consistency, performance, and transparency. To ensure a high level of uptake and incentivise positive reforms, we could include conditions in our grant agreements, requiring evidence that this guidance has been applied to local governance structures and processes.

Management plans

Proposal 3 called for strengthened management plans which set clear priorities and actions for nature recovery and the response to climate change. Our proposed national landscapes strategy will set the national ambition for the expected contribution of protected landscapes towards nature recovery and climate mitigation and adaptation, along with other key goals such as access and community engagement. This will help to align local management plans with relevant national policies and targets such as the goals of the 25 Year Environment Plan and net zero. Natural England will review all revised management plans, ensuring that these make fair and ambitious contributions. To facilitate this new process, Natural England will also update their guidance on management plans for protected landscapes.

Natural England will produce an outcomes framework, provide annual reporting to track progress against the outcomes, and advise on where further action is needed. We will also ensure clear alignment with Local Nature Recovery Strategies, to facilitate delivery of priority nature recovery actions without duplication. As we look to strengthen management plans, we will also consider how best to ensure a smooth transition so that valuable work is not lost.

A clearer role for public bodies

Public bodies have a huge influence on the protection and management of protected landscapes through their policies, programmes, projects, authorisations, and land management practices. It is therefore essential that they take account of the statutory purposes and the relevant management objectives when making decisions relating to protected landscapes, whilst carefully balancing this with the needs of other legitimate land uses such as forestry, agriculture or defence.

Proposal 3 highlighted that the existing duties for public bodies to ‘have regard’ to the statutory purposes are too weak. The vagueness of the duties can lead to disagreements

about their interpretation and allow damaging practices to occur. We therefore propose strengthening the wording of these statutory duties so that they are given greater weight when exercising public functions.

The current duties are also not clear that public bodies are expected to contribute to the delivery of management plans, which can lead to the underperformance of key partners and under-delivery of management plan objectives. The wording should also be made clearer with regards to the role of public bodies in preparing and implementing management plans.

The government will produce guidance for public bodies on the application of the strengthened duties, making it clearer when and how it should be discharged in respect of public functions. These changes would help avoid disputes, reduce damaging practices, and lead to much more effective management of our protected landscapes.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

Sustainable financing

We are proposing an ambitious new vision for our protected landscapes, but the scale of this ambition must be matched by equivalent resources to ensure effective delivery, particularly in AONB teams. We support the principle of proposal 27 that we need to pursue a new funding model to deliver increased and more diverse sources of funding, building on the progress that is already being made in this area.

The government's core grant is essential to supporting our lead partners. We agree with the review's proposal that the grant allocation model should be reviewed to ensure transparency. We have already increased the grant settlement for AONB teams by almost £1 million (15%) for the current financial year, however there is relatively limited scope to increase the core grant by the scale suggested in the review, or to provide longer funding settlements that extend beyond a spending review period. Therefore, the core grant does not provide the opportunity to increase funding to the scale needed to deliver our vision.

There has been increasing interest in private and blended financing models for nature recovery and nature-based solutions, and we believe that this area provides significant opportunities to lever more investment into protected landscapes. The government has recently set an ambitious new target to raise at least £500 million in private finance to support nature's recovery every year by 2027 in England, rising to more than £1 billion by 2030. Much of this could be generated through the sale or trade via environmental markets of the various benefits nature provides – from carbon sequestration to improved water quality. We are working with industry leaders, such as the Financing Nature Recovery Coalition, to understand how to accelerate these markets, whilst ensuring transparency, integrity and the delivery of real environmental improvement. We are

already supporting a number of nature projects in protected landscapes to attract private investment through our [Natural Environment Investment Readiness Fund](#), as well as developing a public-private blended impact fund.

Some of our lead partners have already started to attract private finance into protected landscapes, such as the National Parks Partnership [Net Zero With Nature](#) pilot programme. By learning from projects such as these, and providing the right support, data and expertise, we want to scale up and accelerate these approaches to unlock the economic value of the natural and cultural/heritage capital of our protected landscapes. We want the national landscapes partnership to build capacity to generate additional income through green finance initiatives and joint funding bids. This should include a dedicated national finance team with the right expertise to coordinate our lead partners to design a pipeline of investment-ready projects and maximise the value of investment for our lead partners and landowners. This has the potential to revolutionise the scale of resources available to support the delivery of our vision, particularly for nature and climate.

Protected landscapes have a strong national, and in some cases international, recognition as sites of exceptional environmental importance, natural beauty, and cultural heritage. It is this that drives an estimated 270 million visitors a year from the UK and overseas. The Lake District alone, a UNESCO World Heritage Site, received 19.9 million visitors in 2019. Despite this, evidence gathered during the review indicates that average commercial income of National Park Authorities and the Broads Authority other than fees for chargeable activities such as planning, parking and navigation, is understood to have been in the region of half a million pounds per annum each. This presents a huge, missed opportunity to date but also means there is a significant, largely untapped opportunity to be taken. We expect protected landscapes, individually and collectively, to develop and harness the commercial and sponsorship opportunities provided by their unique brand identity. Driving this agenda should be a key objective of the new national landscapes partnership, which should publish a commercial strategy within a year of being established and target a minimum of five new flagship partnerships across the network by 2025.

General power of competence

National Park Authorities and the Broads Authority currently have specific powers to carry out activities clearly related to their statutory functions. However, this can create uncertainty around the activities that they can legally undertake, particularly related to commercial operations and partnerships. Given that we would like our lead partners to fully explore the commercial opportunities arising from green finance (described above), we do not want them to be constrained by this limited power of competence.

We are considering broadening the legal competence of National Park Authorities and the Broads Authority to a more general power, similar to that of local authorities. We believe this would support a more innovative and proactive role for the protected landscapes and

reduce legal risks associated with a wider range of activities such as affordable housing, public health, and sustainable transport, or working beyond their boundaries.

For details of how to provide your views on this issue, please see **Annex A** – Consultation.

Annex A – Consultation

Implementing some aspects of our response to the review will require changes to legislation, subject to securing parliamentary time. We are seeking public views on support for these proposed legislative changes, and their potential effects on different groups and interests. We are also interested to hear any wider views on other aspects of our response to the review.

How to respond

Please respond to this consultation using the Citizen Space consultation hub at Defra <https://www.gov.uk/government/consultations/landscapes-review-national-parks-and-aonbs-implementing-the-review>

For ease of analysis, responses via the Citizen Space platform would be preferred, but alternative options are provided below if required:

By email to: Landscapesconsultation@defra.gov.uk

In writing to:

Consultation Coordinator, Defra
2nd Floor, Foss House, Kings Pool
1-2 Peasholme Green
York
YO1 7PX

Questions

1. Do you want your responses to be confidential? If yes, please give your reason.
2. What is your name?
3. What is your email address?
4. Where are you located? *North East/North West/Yorkshire and The Humber/East Midlands/West Midlands/East of England/London/South East/South West/Remote*
5. Which of the following do you identify yourself as? *National Park Authority or the Broads Authority/AONB team/Local authority/Other public body/Environmental NGO/Other NGO/Professional body/Academic/Business/Resident of a protected landscape/Member of the general public/Other*

A stronger mission for nature recovery (p10)

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2? *YES/NO/UNSURE.*

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage? *OPEN*

Agricultural transition (p12)

8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.
- *Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.*
 - *Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.*
 - *Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.*
 - *Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.*
 - *Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.*
9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes? *OPEN*

A stronger mission for connecting people and places (p14)

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks? *YES/NO/UNSURE*
11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes? *YES/NO/UNSURE*
12. Are there any other priorities that should be reflected in a strengthened second purpose? *OPEN*

Managing visitor pressures (p16)

13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.
- *Issue Fixed Penalty Notices for byelaw infringements*

- *Make Public Space Protection Orders (PSPOs)*
 - *Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads*
14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes? *YES/NO/UNSURE*
15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?
- *Environmental protection*
 - *Prevention of damage*
 - *Nuisance*
 - *Amenity*
 - *Other [PLEASE STATE]*
16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions? *Yes – everywhere/ Yes – in National Parks and Areas of Outstanding Natural Beauty only/Yes – in National Parks only/No/Unsure*
17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc? *OPEN*

The role of AONB teams in planning (p18)

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes? *OPEN*
19. Should AONB teams be made statutory consultees for development management? *YES/NO/UNSURE*
20. If yes, what type of planning applications should AONB teams be consulted on?
- *AONB teams should formally agree with local planning authorities which planning applications should be consulted on.*
 - *AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects.*
 - *Other [Please state]*

Local governance (p20)

21. Which of the following measures would you support to improve local governance? *Tick all that apply.*
- *Improved training and materials*
 - *Streamlined process for removing underperforming members*
 - *Greater use of advisory panels*
 - *Greater flexibility over the proportion of national, parish and local appointments*

- *Merit-based criteria for local authority appointments*
- *Reduced board size*
- *Secretary of State appointed chair*
- *Other [Please state]*

A clearer role for public bodies (p22)

22. Should statutory duties be strengthened so that they are given greater weight when exercising public functions? *YES/NO/UNSURE*

23. Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans? *YES/NO/UNSURE*

General power of competence (p24)

24. Should National Parks Authorities and the Broads Authority have a general power of competence? *YES/NO/UNSURE*

Overall

25. If you have any further comments on any of the proposals in this document, please include them here. [FREE TEXT]

Confidentiality and data protection

This discussion document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances.

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality

can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and be found at: www.gov.uk/government/publications/consultation-principles-guidance.

If you have any comments or complaints about the consultation process, please address them to:

Consultation Coordinator

Area 7C,

Nobel House 17 Smith Square,

London,

SW1P 3JR.

Or email: consultation.coordinator@defra.gov.uk

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Government response to independent Landscapes Review- Q&A

Top Q&A

Q. Why has it taken two years for the Government to respond to the Glover review?

- The last two years have been an unprecedented time for the country, and the government.
- Since the review was published, the Prime Minister has made a commitment to establish new National Parks and Areas of Outstanding Natural Beauty, which Natural England is now implementing.
- We have established the Farming in Protected Landscapes programme (FiPL), which provides funding to farmers in National Parks and AONBs to deliver projects that support the four key themes of the programme; climate, nature, people and place.
- We have supported important projects in our National Parks and Areas of Outstanding Natural Beauty through our Nature for Climate Fund, Green Recovery Challenge Fund, and Green Social Prescribing pilots, which will help to kickstart nature-based projects to restore nature, tackle climate change and connect people with the natural environment.

Q. When would you expect to make changes to legislation to implement these proposals?

- We are consulting on potential legislative changes to implement certain proposals.
- Where legislative change is considered necessary and appropriate, the timescale for making those changes will be subject to securing parliamentary time.

Q. Will you be investing additional resources in protected landscapes to implement these proposals?

- We have already established the Farming in Protected Landscapes programme, which provides funding to farmers in National Parks and AONBs to deliver projects that support the four key themes of the programme; climate, nature, people and place.
- We have already increased the core grant for AONBs by 15% this financial year.
- We are also pursuing a new long-term funding model to deliver increased and more diverse sources of funding, building on the progress that is already being made in this area.

Q. What will the ‘national landscapes partnership’ look like?

- We are establishing a new partnership that brings existing national organisations, such as National Parks England and National Association for AONBS, to collaborate more closely together for *nature, climate, people and place*.
- This is not a new statutory arms-length body, but a national partnership of existing organisations.
- We are working with partners to agree on the most effective governance arrangement for the partnership.

Q. What will the partnership do?

- The partnership will bring together the organisations responsible for managing our protected landscapes.
- We expect the partners to collaborate to help address national issues in the public interest, such as recovering nature, tackling climate change, and improving access to nature.
- Our national landscapes strategy will set out priorities for the partnership to focus on.

Q. Will the devolved administrations be taking forward similar proposals for protected landscapes?

- Landscape policy is a devolved matter. It is therefore a matter for each administration to decide how best to manage their National Parks and AONBs that reflects their own legislative context and in a way that works best for the people and environment of their nation.
- We will continue to discuss our proposals with the devolved administrations, and will explore opportunities to take forward proposals jointly, where it would be appropriate and beneficial to do so.

Since publication of the review

Q: What have you done to designate more landscapes since the Landscapes Review was published?

- The Prime Minister's ten-point plan for a Green Industrial Revolution included a commitment for creating more National Parks and AONBs as set out in the government's manifesto.
- In June 2021 Natural England set out an ambitious designation programme which includes the consideration of two new AONBs, the Yorkshire Wolds and Cheshire Sandstone Ridge, together with extensions to the Surrey Hills and Chilterns AONBs.
- The England Trees Action Plan sets out proposals to support Woodland Creation Partnerships to establish at least three new community forests.

Q. Who makes decisions with regard to new landscape designations?

- Natural England is the government's independent adviser on the natural environment, with special responsibilities for creating National Parks and Areas of Outstanding Natural Beauty.
- Designation orders made by Natural England are subject to the DEFRA Secretary of State's confirmation.

Q. What is the timescale for the landscape designation programme?

- A national landscape designation (AONB or National Park) is a significant undertaking, requiring sufficient time to gather robust evidence, and to engage and consult with local and national communities and stakeholders.
- We expect each designation to take approximately 2-3 years. The time until the Minister confirms an order varies according to several factors including whether a public inquiry is deemed necessary.

Q. What is an 'all-England Assessment'?

- Natural England aims to create a visionary map for England in the 21st Century, reflecting the spirit of the Hobhouse Map which led to the establishment of the first National Parks 70 years ago.
- The new assessment will identify landscape conservation and enhancement needs across England, including any remaining places suitable for future National Park or AONB designation.
- It will also identify those places where new landscape designation and approaches will be more appropriate and are wanted by local communities.

Chapter 1- A more coherent network

Q. Is the Government creating a new public body?

- We believe that creating a new public body would cause unnecessary complexity, cost and disruption at a crucial time for protected landscapes.
- We are working with existing partners to establish a national landscapes partnership, which has the potential to develop strategic partnerships and programmes, build capacity and generate additional income for the protected landscapes.
- We are working with partners to develop the structure of this new partnership in the coming months.

Q. What will the new partnership cost?

- The partnership will cost considerably less than a new public body, as proposed by the review.
- We envisage the partnership may have a small central staff, overseeing national campaigns and programmes, creating opportunities for training and development, and building capacity to generate additional income for National Parks and AONBs across the country.

Chapter 2- Nature and Climate

Q. How will you improve nature recovery in protected landscapes?

- National Parks and Areas of Outstanding Natural Beauty (AONBs) will form an important part of the Nature Recovery Network.
- We will increase the extent of our protected areas and drive up their biodiversity value to support delivery of government's commitment to protect 30% of land for nature by 2030.
- We will create and restore wildlife rich habitat within our protected areas and establish connectivity beyond their boundaries to improve the abundance and resilience of species.

Q. How can protected landscapes contribute to the delivery of 30 by 30?

- We know that National Parks and AONBs cannot be said to contribute to 30by30 in their entirety at this time
- At the same time, protected landscapes have enormous potential to deliver on our environmental ambitions, including the 25 Year Environment Plan goals, Environment Act targets, and reaching net zero.
- We are working to understand, including through planned consultation with stakeholders through a Green Paper due later this year, what reform, investment and management might be required in these areas to ensure that more of them can contribute by 2030.

Q. How can protected landscapes contribute to the development of Local Nature Recovery Strategies?

- We have explored the important roles that National Park and AONB teams can play as part of the five LNRS pilots which we ran in 2020-21.
- They should support responsible authorities in preparing and delivering LNRSs, utilising their expertise to highlight landscape scale opportunities across their areas and embedding links with their statutory management plans so they align.
- Teams in Protected Landscapes are well placed to use their extensive knowledge of their areas, together with strong local partnerships, to contribute to LNRSs and drive nature's recovery.
- Further details on LNRS rollout will be published in due course.

Q. Why are you changing the first statutory purpose?

- We are proposing to strengthen the wording of the first statutory purpose to make it more focused on nature recovery and natural capital. We need to actively recover nature in these areas, rather than simply conserve what remains.
- As part of the consultation, we are seeking views on any other priorities, such as climate change, which could form part of a strengthened first purpose.
- We want our protected landscapes to be living, working, naturally beautiful and nature rich areas sustained through rich cultural heritage and support from local

communities. The proposed changes as part of the response to the Landscape Review will help to achieve this.

Q. How is Government going to improve monitoring in protected landscapes?

- Improving our monitoring and reporting in protected landscapes will help us to understand the state of nature and prioritise action towards our desired environmental outcomes.
- New ambitious outcomes for protected landscapes should contribute towards our 25 Year Environment Plan and the statutory targets in the Environment Act 2021.
- Natural England will monitor and evaluate progress against the key indicators and outcomes and will also help to translate these into individual management plans.
- We are developing the Natural Capital and Ecosystem Assessment (NCEA), which will provide data on habitats, natural capital, and ecosystem function, to help monitor progress towards agreed environmental outcomes and inform the priorities of protected landscapes.

Q. How will the Environmental Land Management Schemes work in protected landscapes?

- The response sets out a number of options for how the special status of Protected Landscapes could be reflected in the design and delivery of our Environmental Land Management schemes.
- As part of the consultation we would like to seek views on these options and how farmers and landowners in Protected Landscapes can best engage in the Environmental Land Management Schemes.
- We want to build on the successes and learnings from the Farming in Protected Landscapes programme and incorporate these into new schemes as they are developed.

Chapter 3- People and place

Q. What is the Government doing to increase access to nature to improve public health?

- We are working with National Park and AONB teams and other partners to develop opportunities to enhance people's engagement with the natural world and to open up the mental and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds.
- Defra is working closely with the Department for Health and Social Care to pilot green social prescribing projects to improve mental health outcomes, reduce health inequalities, reduce demand on the health and social care system, and develop best practice at a local level.

Q. What has the Government done since the review on increasing access to nature in protected landscapes?

- One of the main objectives of our £80 million Green Recovery Challenge Fund is "connecting people with nature" to support a green recovery from Covid-19. This has invested in nature-based projects across England, including several National Parks and AONBs.
- The Farming in Protected Landscapes programme provides funding for increasing public access, such as improving existing rights of way and associated signage or the provision of permissive access.

Q. What is Government planning to do to specifically enhance engagement for all parts of society?

- A key function of the national landscapes partnership will be to enhance community engagement through national strategic partnerships and collaborative campaigns. These will ensure that currently underserved communities and demographics are welcomed and engaged with their protected landscapes.
- The government is funding the 'Generation Green'. This partnership project aims to provide more than 100,000 progressive opportunities to connect young people to nature, prioritising young people from BAME groups, disadvantaged backgrounds and coastal communities. The partnership includes the 10 English National Park Authorities.
- Defra has commissioned two independent social research projects to increase understanding of children and ethnic minority engagement with protected landscapes. The projects generate practical recommendations to inform policy development and the design and implementation of future engagement programmes.
- Defra is working to explore how we can expand volunteering and connect with currently underserved communities to create a more inclusive and diverse community of visitors and volunteers.

Q. Will the Government be funding any increase in the number of rangers in protected landscapes?

- Rangers are the eyes and ears of a landscape, engaging visitors, local people and landowners.
- We are working across government and with National Park and AONB teams to explore ways of increasing the number of rangers engaging with people in protected landscapes.

Q. What impact will amending the second statutory purpose and extending it to AONBs have?

- A strengthened second statutory purpose, extended to the AONBs, would clarify and reinvigorate our ambition to connect with all parts of society.
- We will ensure that any revised purpose does not create any unnecessary burdens for public bodies, or have unintended consequences for National Parks and AONBs.
- Timescales for making this change are subject to securing parliamentary time.

Q. Why have you rejected Glover's recommendation to make the statutory purposes of National Parks and AONB more focussed on socio-economic issues?

- Many National Park Authorities already discharge their existing statutory duty effectively for the benefit of their local communities and businesses.
- There is a risk that introducing a new purpose could dilute the importance of the existing purposes and have unintended outcomes such as impacts on future designations.
- Extending the existing duty to AONBs based in local authorities may have a very limited effect, as they already have statutory responsibilities to consider the rural economy.

Q. What other measures are you proposing to improve the economic and social wellbeing of communities?

- The Farming in Protected Landscapes programme is already providing funding in protected landscapes to deliver towards this recommendation.
- National Park Authorities should be supported to discharge their existing duties effectively and consistently, for when preparing and implementing their management plans.
- National Park and AONB teams should strengthen their relationships with local economic development bodies such as Local Enterprise Partnerships.
- We would also like to see greater community representation on boards and committees.

Q. Are you going to expand open access rights?

- We will confirm the national Open Access land maps as a first step prior to considering what expansion of access rights may be appropriate.

Q. Why can't you revise open access rights in parallel with confirming the open access land maps?

- We are listening to stakeholders who have expressed clearly that this is the correct way around.
- The establishment of precisely where open access rights exist is a logical first step before considering whether to expand those rights.
- Once the mapping is complete, we can identify the best options to improve access, for example joining up with the rights of way network.

Q. What are you doing to bring the National Trails into the protected landscapes family?

- National Trails are an important part of the protected landscapes family.
- A new charity called National Trails UK is being established to support the work of the National Trails.
- We are exploring the role that National Trails UK could play as part of the new national landscapes partnership.

Q. What will changes to the traffic regulation order (TRO) process look like?

- The current TRO process to preserve the surface of an unsealed route is open to interpretation and as such can be easily contested in the courts. National Park Authorities also currently only have the power to issue TROs on byways, whereas many unsealed routes are unclassified.
- We are consulting on proposals to create specific grounds for issuing TROs, to prevent damage to the surface or preserve the character of an unsealed route.

Q. Why do you want to ban motor vehicles on unsealed routes if National Park Authorities can already impose restrictions on them?

- Traffic Regulation Orders are often onerous, contentious and expensive for authorities to introduce due to the risk of litigation involved. As such, many authorities do not use them as they have limited resources to do so, and yet are still required to maintain the surface of routes which may be subject to repeated damage by motor vehicles.
- We are consulting on possible statutory access restrictions on unsealed routes, that would provide legal clarity, and reduce the need to use Traffic Regulation Orders.

Q. What impact would restrictions on Green Lanes have on access for people with disabilities?

- We would ensure that people with disabilities are still able to access routes with vehicular rights removed.
- The aim of the restrictions is to protect the route from damage. This should improve access for people with disabilities who need to use mobility vehicles on the routes.
- The needs of people with disabilities will be carefully considered as part of an equality impact assessment to establish if further exemptions are required.

Q. What exemptions would there be for access on Green Lanes ?

- Existing rights of access for necessary use will be maintained. This includes, but is not limited to:
 - Residential
 - Business
 - Emergency services
 - Infrastructure (such as power, water)

Q. How will you ensure that the government retains the high level of protection afforded to National Parks and AONBs as part of planning reform?

- The National Planning Policy Framework gives 'great weight' to the landscape and scenic beauty of AONBs and National Parks and establishes a default of no major development within them unless exceptional circumstances can be demonstrated.
- We are continuing to work closely with colleagues in Department of Levelling up, Housing and Communities, to ensure that planning reforms continue to protect places of environmental and cultural value, particularly our National Parks and AONBs.

Q. What is a statutory consultee?

- Planning law prescribes circumstances where local planning authorities are required to consult specified bodies prior to a decision being made on an application.

Q. Will there be an opportunity to review landscape and visual policy set out within the National Planning Policy Framework?

- The recent update to the National Planning Policy Framework in July 2021 included changes with regards to protected landscape policy to avoid adverse impacts on the designated landscapes.
- A review of the National Planning Policy Framework is likely to be required as part of the programme of planning reform, subject to decisions on how the reforms will be taken forward.

Q. What is a permitted development right?

- Under a national grant of planning permission known as a permitted development right certain types of development can be carried out without having to apply for planning permission from a local planning authority.

Q. What has the government achieved with regard to affordable homes in rural areas?

- Over 190,000 affordable homes have been provided in rural local authorities in England since April 2010.
- Between April 2015 and March 2020, 11% of new build additional Affordable Homes have been delivered in villages with a population of fewer than 3000
- We recognise the importance of these settlements for both economic and housing growth.

Q. What support is government offering to support affordable housing in protected landscapes?

- We are progressing delivery of suitable, and affordable housing for local communities in rural areas, including protected landscapes.
- We will deliver this through the government's proposed reforms of the planning system and Homes England's funding prospectus for the new 2021-26 Affordable Homes Programme.

Chapter 4- Supporting local delivery

Q. Will your proposals reduce local representation?

- Local authority members have an important role in ensuring local voices are heard, and giving the board democratic legitimacy. As such, we are not proposing to remove all local authority members, as was recommended by the review.
- We are seeking to retain local representation while streamlining boards so that they can more efficiently use local knowledge to deliver national strategic priorities.

Q. What is the government doing to strengthen management plans?

- Strengthening the statutory purposes, together with the duty of regard on relevant bodies, will in turn reinforce the role of management plans in delivering our goals.
- Ambitious goals to tackle climate change, including both mitigation and adaptation measures, together with improved natural capital reporting, should be embedded in all management plans.
- We are working with Natural England to establish the contribution of our protected landscapes towards key environmental targets including in the 25YEP, the Environment Act and the Net Zero Strategy.
- Natural England are working on an accompanying outcomes framework which will help to translate these targets into local management plans and help to monitor and evaluate progress.
- Natural England will also play a stronger role in reviewing the delivery of management plans.
- As we look to strengthen management plans, we will also consider how best to ensure a smooth transition so that valuable work is not lost.

Q. What is the government doing to support more investment in the protected landscapes?

- We have already increased the grant settlement for AONBs by almost £1 million (15%) for the current financial year.
- We need to develop a new funding model that delivers increased and more diverse financing. Core grant funding will continue to be available for National Park Authorities and AONBs teams.
- The baseline three-year funding settlement for protected landscapes will be confirmed shortly, subject to the conclusion of Defra's business planning process.

Q. How do you expect the protected landscapes to deliver more without significant additional resources?

- We believe that private and blended financing models provide significant opportunities to lever more investment into protected landscapes, alongside government funding such as the Farming in Protected Landscapes programme and Environmental Land Management schemes.
- Some of our lead partners have already successfully attracted private finance into protected landscapes, such as the National Parks Partnership Net Zero With Nature pilot programme.
- We are also already supporting a number of nature projects in protected landscapes to attract private investment through our Natural Environment Investment Readiness Fund (NEIRF).
- By learning from projects such as these, and providing the right support, data and expertise, we want to scale up and accelerate these approaches to unlock the economic value of our protected landscapes.

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UNDER EMBARGO 0001 SATURDAY 15 JANUARY 2022

Ambitious proposals to strengthen our protected landscapes announced

- Nature, climate, people and places prioritised in the Government's response to Julian Glover's Landscapes Review
- Package of measures will boost nature recovery efforts and safeguard our protected landscapes for future generations
- A new national partnership will promote greater collaboration between protected landscapes to improve people's access to nature

Plans to boost nature recovery and safeguard England's iconic national parks for future generations have been set out today by Environment Secretary George Eustice.

The proposals, which will be subject to consultation, are set out in the Government's response to Julian Glover's independent Landscapes Review which looked at whether the protections for National Parks and Areas of Outstanding Natural Beauty (AONBs) are still fit for purpose. The Government's response sets out ambitious changes to increase access to nature and ensure protected landscapes can deliver more for climate, nature, people and places for the next 70 years and beyond, as we build back greener from the pandemic and level up all parts of the country.

A new national landscapes partnership will bring together those responsible for managing England's National Parks and AONBs to collaborate, share knowledge and tackle common objectives such as nature recovery and improved public access.

By harnessing their collective strengths whilst preserving their independence, the partnership will support local leadership to work together nationally, including by carrying out campaigns, organising events and offering volunteering opportunities that bring people closer to nature.

The 12-week consultation will also ask for views on proposals to drive nature recovery within our landscapes and support for the communities that live and work within them, such as the design and delivery of new agri-environment schemes and an ambitious management plan for each area.

This announcement forms part of the Government's wider action to recover and restore nature, delivering on the pledge within the 25 Year Environment Plan to protect 30% of the UK's land by 2030 and commitments to achieve net zero by 2050.

Environment Secretary George Eustice said:

"Our National Parks and Areas of Outstanding Natural Beauty are amongst our nation's greatest and most cherished natural wonders. The comprehensive set of measures set out today represents a new chapter in the story of our protected

landscapes and we have worked closely with stakeholders to carefully form our response.

“These reforms will play a pivotal role in meeting our international commitment to protect 30% of land for biodiversity by 2030 as we build back greener.”

The package of measures announced today reflects many of Julian Glover’s recommendations, as part of a renewed and strengthened focus on nature recovery in our protected landscapes and to make them greener and more accessible to everyone.

Chair of Natural England, Tony Juniper said:

“From the beauty of the sandy beaches of the Scillies to the rugged glory of Northumberland, our protected landscapes are integral to our national identity, our health and wellbeing and our country’s prosperity.

“As Government’s statutory landscape advisor, Natural England has a pivotal role in making sure our National Parks and AONBs are beautiful, thriving places. We welcome this package of measures which will help them deliver even more for the whole of society and combat the twin challenges of climate change and biodiversity loss. We look forward to playing a leading role in the national landscapes partnership and working closely with Government, protected landscape bodies and stakeholders to deliver these ambitious proposals.”

Julian Glover, who led the review, said:

‘This is our chance to make England’s landscapes more beautiful, better for people who visit and live in them and far more alive with nature. Our countryside is there for all of us, but from the heaths of the New Forest to the high fells of the Lake District, it is under pressure in an urban world. It won’t be enough just to try to conserve what we have inherited - we can change the story from decline to recovery, to make them greener, more welcoming and full of hope. The review I led showed what needs to be done and I’m pleased the Government has agreed to act.”

Protected landscapes play an essential role in tackling climate change, protecting biodiversity, and supporting the nation’s health and wellbeing. Evidence from Natural England shows that almost half the population say that they are spending more time outside than before the pandemic, while the majority of adults surveyed by Forest Research agreed that their level of happiness when in nature has increased.

However, the pandemic has also highlighted the inequalities of access to greenspaces, with evidence from Natural England demonstrating that approximately a third of those on the lowest incomes visited a natural space in a typical week during the pandemic, compared to almost 60% amongst those on high incomes. Today’s measures aim to increase people’s access to nature, so more of England can benefit from having access to beautiful nature-rich landscapes.

Recognising the need to raise the profile of great British landscapes – particularly AONBs - as national assets, the 12-week consultation will also seek views on proposals, including:

- encourage improved access to our protected landscapes and nature for all parts of society, particularly where this supports improved public health and wellbeing;
- continue support for the local communities that live and work in protected landscapes, helping preserve our heritage for future generations;

- drive nature recovery and nature-based solutions within protected landscapes to help address the twin challenges of biodiversity loss and climate change; and
- apply structural changes and resources to support our protected landscapes in delivering more for nature, climate, people and places.

The consultation closes on Saturday 9 April 2022 and can be found [here](#).

ENDS

Notes to Editors:

- The Landscapes Review, published in 2019, set out a series of recommendations, including that more should be done to support nature's recovery in these landscapes; that the status of AONBs should be strengthened; that there was a need to bring the family of protected landscapes closer together with more strategic oversight and greater opportunities for career progression; and that more funding should support public access to protected landscapes.
- The Government's response to the Landscapes Review can be found [here](#).
- The consultation can be found [here](#).

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Media Release

15 January 2021

National Parks England welcomes the launch of the government consultation regarding the future of our National Parks.

Andrew McCloy, Chair of National Parks England said: “National Parks play a vital role for the nation, supporting people, places, climate and nature.

“We share the aspirations that were identified in the Landscapes Review, some of which are outlined in the government’s consultation document. Protected landscapes should be empowered to deliver more for nature, climate and people but need adequate resources and powers to make this happen.

“England’s National Park Authorities are ambitious, innovative and forward-thinking organisations, determined to continue driving forward our joint ambitions over the coming years with government support.

“Since 2019 National Parks individually and collectively have made great progress in delivering against many of the proposals in the Landscapes Review. We have published four detailed delivery plans which highlight our ambitions.

“National Parks have been critical in helping the nation recover from the Covid-19 pandemic. We have welcomed more visitors than ever before, supported our local communities, and demonstrated that green spaces benefit the nation’s physical and mental health and wellbeing.

“Together with our communities, partners and visitors we aspire to build back a brighter green future for the country, more resilient to climate change, with an abundance of wildlife and amazing places for people to live, work and visit.

“We look forward to responding to the government’s consultation in detail in due course.”

ENDS

Notes to editors

For further information please contact:

National Parks England - enquiries@nationalparksengland.org.uk

About National Parks England

National Parks England brings together the nine English National Park Authorities and the Broads Authority, to provide a strong, collective and expert voice at a national level. We shape policy by drawing on our extensive experience, facilitating discussion, sharing knowledge, cultivating partnerships, and testing innovative solutions to some of the biggest challenges facing society.

For more information on National Parks England's work see:

www.nationalparksengland.org.uk

For more information on our delivery plans, see:

<https://www.nationalparksengland.org.uk/home/about-national-parks-england/national-parks-collective-vision-and-priorities>

For more information on the UK's fifteen National Parks go to:

www.nationalparks.uk

7. 2022/23 REVENUE BUDGET, 2022/23 CAPITAL PROGRAMME AND MEDIUM TERM FINANCIAL PLAN 2022/23 TO 2025/26 (JW)

1. Purpose of the report

This report presents the Authority's 2022/23 revenue budget and capital programme for Member approval.

2. Recommendations

- 1. the Authority's annual budget for the 2022/23 financial year as shown in Appendix 1a be approved.**
- 2. Members note the Authority's capital programme for 2022/23 as shown in Appendix 2.**
- 3. Members note the RMM approved projects for investment up to £335k as shown in Appendix 3**
- 4. Members note the Medium Term Financial Position (MTFP) of the Authority in the period up to March 2026 and the timetable as shown in Appendix 4.**
- 5. Members note the position of the Authority's Reserves.**

How does this contribute to our policies and legal obligations?

3. The Authority is required to set a balanced revenue budget for the 2022/23 financial year. For 2022/23 the National Park Grant is 100% funded from central government for the nineteenth year. In previous years, 25% of the Grant was financed from a levy on constituent councils, although the funding was still provided centrally by the Department of Environment, Food and Rural Affairs (Defra) to Local Authorities. The Authority's levying powers remain and are in theory capable of being used in the future, although in the past they have always been used by way of joint agreement between Defra and the Ministry of Housing, Communities and Local Government, with a corresponding mutual funding arrangement so that the cost of National Parks was not borne by local taxpayers. Although they remain unused, it is considered that retaining levying powers is an important consideration in terms of the Authority's ability to recover VAT as a Section 33 body, within the same VAT regime as Local Authorities, as well as its utility as a funding mechanism being preserved in statute.

Background

4. The National Park Grant, provided by Defra, is the Authority's largest source of income amounting to approximately £6.7m annually. The Spending Review in November 2021 set departmental budgets to 2024/25, however at the time of writing this report the Authority's 2022/23 NPG settlement figure is not known. Therefore, the MTFP is assuming that the settlement will be a further flat cash settlement for the next 3 financial years to 2024/25. There remains uncertainty around how the pandemic will continue to affect daily life and it is against this backdrop that the budget has been set on the basis that the Authority will continue to receive no inflation protection nor any other increases to the NPG.
5. The settlement for 2020/21 was a "flat cash rollover" of the 2019/20 budget of £6.7m for the Authority. In the letter received from Defra for the 2021/22 budget, the previous "allocation of £335k from a dedicated Biodiversity Fund" has now been embedded back within the grant base value and is no longer earmarked for biodiversity work. The Authority continues to report to Defra on how the Authority planned for and uses the NPG.

6. For the 2021/22 budget the Authority took decisions that cut £609k from the base budget, this, along with the baselining of the 'biodiversity fund' means that in 2022/23 has been balanced without the need for further savings. The MTFP later in this report shows that for investment in People, Assets, Fundraising and Digital cost reductions will need to be found for 2023/24 and beyond.
7. The 2021/22 budget was set on the basis that if the Authority were to receive the £335k Biodiversity funding in 2021/22, then the use of the monies received was delegated to the Chief Executive in the 2021/22 Budget Report (19th February 2021, minute number 8/21). These options were shortlisted at management team meeting 14th December 2021 and agreed at RMM on 11th January 2022. The agreed options are at Appendix 3.

Proposals – 2022/23 Budget

8. The 2022/23 has been set on the basis that there is a balanced budget for the financial year. The Finance team have worked with budget holders and budget managers to review the baseline budgets and set the 2022/23 using a bottom up approach. The review was completed on the basis that services have to stay within their current baseline budget envelope however budgets were reviewed to make sure that operational budgets were a true reflection of the expenditure and income for their service.
9. There remains uncertainty around the impact of pay awards for both 2021/22 and 2022/23. The 2022/23 pay budget has been set on the basis that the current proposal of a 1.75% pay award for 2021/22 will be implemented before the end of the financial year. There is then a further assumption that the pay award for 2022/23 will be at 2%, therefore, a pay contingency of £150k is included in the 2022/23 budget to cover this increase. The pay budget also includes the new higher National Insurance contribution for employers at 15.05%, up 1.25% from 13.80%. This has been funded within the NPG.
10. In line with the 2019 actuarial revaluation results, published in January 2020, the employer contributions for 2022/23 will remain at 19.57%. The Actuary considered this level was required to maintain the Authority's pension fund at 101% funded (92% - 2016), but to achieve this an increased level of employer contributions (by 1% – from 18.57% to 19.57% of gross salary costs) was recommended by the Actuary with an objective to maintain funding at this level. This increase was implemented in 2020/21 and is to be maintained in 2022/23 (included within the pay costs shown in Appendix 1a).
11. The budget includes a £50k saving relating to vacancies that naturally occur throughout the financial year across all departments. The assumption is that there will be a saving to the Authority whilst posts are vacant as part of usual recruitment practices (i.e. gaps between officers leaving and new officers being appointed into post).
12. Interest rates were raised in December 2021 to 0.25%, however this was a very small increase, therefore it has been assumed that interest received on investments will continue to be very low. Sums are invested with North Yorkshire County Council (as per the Authority report on Treasury Management which will be presented in March) and are budgeted to be at £15k for 2022/23.
13. A small non-pay inflation provision of £20,000 is included in the budget. This small amount is aimed at unavoidable and contractual expenditure increases (e.g. utilities bills, audit fees, licences etc.) however, it does not offer protection from the effects of

inflation for the majority of budgets. Bidding for the allocation of funds is done at the Midyear Review stage (November 2022).

14. It has been assumed that all income budgets will be recovered to pre-pandemic levels in 2022/23.
15. The Peak District National Park Foundation charity may grant aid funding towards some of the Authority's development projects during the year. These sums, if they are granted by the Trustees, are additional contributions and it is expected that they will be ring-fenced for the purposes they were granted. A notional estimate of £80k is shown in the budget, but is matched by ring-fenced expenditure to the same amount, so that the effect on the baseline budget is nil, demonstrating that the grant income is fully used on projects.

Appendix 1a & 1b – Revenue Budget 2022/23

16. As in previous years, the budget headings contained within Appendix 1a are shown within the Corporate Strategy outcomes, with the budgets structured and reported for costing and budget monitoring purposes according to their separate business units / activities, which are recognisable to Members. A detailed explanation of the headings within Appendix 1a is shown at Appendix 1b.
17. Column K and L show the net budget approved by Members in 2021/22, and the difference respectively. A brief reason for any large difference is highlighted.
18. Columns M and N show the support service recharges and the full cost of the front line service respectively. This is the re-allocation of costs from the support services (shown in the Agile and Efficient Organisation heading) to front line services based on estimates of the level of support to each service.
19. The full cost of the front line service is used as a financial objective for some budgets in line with previous committee resolutions, and understanding the full cost of our individual properties is an important aspect of Local Authority governance and property management and the recent improvements in accounting for these properties as business units continues. Some re-calculations may be necessary as a result of the different management inputs into the properties, and as mentioned above the full cost of the properties also depends on a complex support service recharge model. The calculations for which were made in 2013 however, the calculations are considered to be sufficiently indicative for current purposes.
20. A number of properties and business units have these financial objectives:-

| Service | Financial Objective | Minute Reference |
|-------------------|---|-------------------------|
| Warslow Estate | 100% Full Cost Recovery | Authority 57/14 |
| North Lees Estate | 94% Full Cost Recovery | ARP 16/15 and 53/15 |
| Minor Properties | Break – even on direct costs | Authority 57/14 |
| Visitor Services | 76% Full Cost Recovery (a combination of the old cycle hire service of 100% and the visitor centres of 70%) | ARP 16/15 and 54/15 |

21. Annually, the Authority depends on some £2.5m of externally generated income (fees and charges) to balance its revenue budget. Services with income targets are expected to increase targets routinely to cope with pay and non-pay inflationary

increases in order to maintain margins and stay within established financial objectives, as well as accommodate additional targets approved as part of coping with reduced grant levels.

Capital Strategy and Programme 2022/23

22. The Chief Finance Officer's report on the application of the Prudential Code for Capital Finance will be reported to the March 2022 Authority meeting, and the day to day responsibility for Treasury Management is set within the constraints of the Treasury Management Policy, which forms part of the same report.
23. The current Capital Strategy was approved in December 2015 covering the years 2015 to 2020. This will be refreshed in line with the refresh of the National Park Management Plan and Corporate Plan. The work will also be closely aligned to the Asset Management and Disposals Plan.
24. The currently approved capital projects are shown in the Capital Programme for 2022/23 at Appendix 2 and is based on currently approved capital schemes plus new projects for IT which are funded from the revenue budgets annually and included in the 2022/23 budgets for approval. The current capital strategy refresh is overdue and it also does not make reference to statutory landlord or building obligations however the Authority has a legal responsibility to include these projects within the Capital Programme. This will be brought to members as part of the Autumn 2022 workshops.

Medium Term Financial Plan 2022/23 to 2025/26

25. As previously mentioned, the Authority is still awaiting an announcement from Defra of our NPG for 2022/23. It is assumed that the level of NPG will remain at the same value (£6.699m) for the next three financial years. This is the same value as in the previous three financial years (from 2019/20).
26. The MTFP is as follows:

| | 2022/23 £000's | 2023/24 £000's | 2024/25 £000's | 2025/26 £000's |
|---|-------------------|-------------------|-------------------|-------------------|
| Net Expenditure | 6,566 | 7,155 | 7,302 | 7,491 |
| Financed by: | | | | |
| National Park Grant | (6,699) | (6,699) | (6,699) | (6,699) |
| Reserves and Interest | (72) | (72) | (72) | (72) |
| Funding | (6,770) | (6,770) | (6,770) | (6,770) |
| (Surplus) or Deficit after financing | (204) | 384 | 532 | 721 |
| Cumulative Position | (204) | 180 | 712 | 1,433 |

27. The key assumptions included in the MTFP are:
 - The NPG will not increase for the whole period;
 - Pay will rise by 2% each year;
 - The vacancy factor of £50k continues to support the annual budget;
 - There will be no other significant taxation changes;
 - The superannuation triennial review will result in a 1% increase in employer contributions from 2023/24 onwards;
 - £20k per year included for non-pay inflation;
 - Investment income remains low at £15k per year.
28. Based on the assumptions above, the budget for 2022/23 is balanced, however

there will need to be a cost reduction plan implemented from 2023/24. An analysis of options will be made between January 2022 and October 2022 with this being included in the members autumn workshops and brought to members for decision in November 2022. This is in line with the timetable for the National Management Plan and Corporate Strategy refresh. The detailed timetable is at Appendix 4.

29. The MTFP includes the investment of funds in four key areas, these areas are to enable the Authority to continue to operate into the future:
- Assets, estimated costs £182k in 2023/24, reducing to £174k in 2024/25 (included in the MTFP).
 - People, estimated costs £275k in 2023/24, £335k 2024/25 and £320k in 2025/26 (included in the MTFP).
 - Fundraising, cost options expected January/ February 2022, (not yet included in the MTFP).
 - Digital, cost options expected March 2022, (not yet included in the MTFP).

Cost reductions mentioned above will need to be made across the Authority to accommodate cost increases from investments made in these four key areas.

Reserves

30. Clause 25 of Part 2 of the Local Government Act 2003 requires the Chief Finance Officer to report to Members, when calculating the net budget requirement, on the level and adequacy of cash reserves. The full level of reserves is reported to Members in the Outturn report in May and in the financial accounts. The level of cash backed reserves are carefully managed and the situation at the end of 2022/23 is expected to be:-

| <u>Reserves (£'000s)</u> | Actuals as at 31/03/2021 (from Statement of Accounts) £'000s | Estimates as at 31/03/2023 £'000s | Difference £'000s |
|---------------------------------|---|--|------------------------------|
| General Reserve | 222 | 563 | 341 |
| Minerals & Legal Reserve | 535 | 535 | 0 |
| Restructuring Reserve | 61 | 311 | 250 |
| Matched Funding Reserve | 1,230 | 1,226 | (4) |
| Slippage Reserve | 1,187 | 590 | (597) |
| Covid-19 Reserve | 1,087 | 683 | (404) |
| Capital Reserve | 877 | 953 | 76 |
| Specific Reserves | 1,355 | 1,301 | (54) |
| Restricted Reserves | 50 | 122 | 72 |
| Total | 6,604 | 6,284 | (320) |

The reduction in reserves of £295k is 4.47% of the 31 March 2021 reserve balance. This comprises the expected use of capital reserves, the addition of capital receipts from the sale of Lower Greenhouse Farm and an expectation that the value of slippage will reduce at the end of 2021/22. The table also includes the movements approved by members on 12th November 2021 which was the re-appropriation of the Covid-19 reserve to the Restructuring Reserve and General Reserve. The increase in restricted reserves is due sums received from two legacies received in 2021/22.

31. General Reserve

The minimum level of the general reserve has traditionally been calculated on the basis of a recommended level which is 2% of net expenditure (approximately £130k), with a trading contingency of £75k, giving a base level of £205k. However this should be considered as an absolute minimum. The expected surplus of £211k in 2022/23 plus the forecast level of £352k at the end of 2021/22 gives a total of £563k in 2023 which is considered to be sufficient given the current complex mix of activities within the revenue budget. The forecast for the general reserve value has increased due to additions approved by Members on 12th November 2021. The level of the reserve is reviewed annually to take account of the availability of other reserves, the degree of income risk, the degree of risk underlying budget assumptions, and the availability of other contingencies.

32. Minerals & Legal Reserve

This contains funds anticipated to be required to handle a number of minerals and other legal cases (e.g. Rights of Way and Compulsory Purchase Orders) and the levels potentially required are kept under regular review by Resource Management Meeting. The reserve needs to be maintained at a level which allows a degree of financial resilience in handling a number of cases without immediate recourse to re-allocation of baseline resources which would disrupt other priorities, especially when those resources are under pressure from saving imperatives.

33. Restructuring Reserve

This is used for statutory redundancy and superannuation fund shortfall payments and was essential in providing the one-off resources needed to support the transition to a lower baseline and restructuring. Staff changes resulting in payment of superannuation shortfalls and/or redundancies are expensive. This reserve had additions approved by Members in November 2021 and will be used fund any future redundancies.

34. Matched Funding Reserve

This is used to earmark funds for commitments already made for matched funding payments to external funding projects, and has also been used as the temporary home for one-off sums requiring agreement on allocation against priorities. The timing of expenditure for the approved allocations varies, with the earmarked sums for future years retained in the reserve. The reserve is expected to diminish over time as the one off sums are spent. The contingency for the Moorlife 2020 project (£500,000) is also retained within this reserve.

35. Slippage Reserve

This a temporary year-end balance arising from the deferral of expenditure between financial years. The funds are all committed and are allocated into budgets in the next financial year, once slippage requests have been approved at the May Authority meeting. The level is expected to reduce as carried forward sums are utilised. There has also been a new set of principles which will be applied to requests at the end of 2021/22 onwards.

36. Covid-19 Reserve

Members agreed to establish this reserve as part of the 2019/20 outturn report in response to the coronavirus pandemic and Defra directives stating that National Parks should use their reserves to offset Covid-19 related deficits rather than rely on any additional support from Defra. This reserve has been created from other reserves. Members approved the reduction of this reserve to £683k approved by Members in November 2021. The retention of this reserve will be reviewed at outturn 2021/22, dependant on the pandemic situation or whether there are any restrictions at the time.

37. Capital Reserve

This is only available to support capital expenditure as it holds unused proceeds from the disposal of capital assets. This reserve will be used to support the capital programme and will also be considered as part of the Capital Strategy refresh.

38. Specific Reserves

These are used to support individual service areas and each reserve's objective and planned usage is reported to the Authority in May. Specific reserves, although earmarked for specific purposes, are available to support any Authority priorities as required in an emergency, subject to any commitments already made from them. As tighter financial objectives are set for the property portfolio and other business units, it is considered important that the property managers have access to a specific reserve, to allow them to manage and achieve their financial objective between financial years without impacting on corporate reserves.

39. It is necessary to maintain reserve levels at present, due to the continuing uncertainty over future resource provision (e.g. future NPG levels, coronavirus pandemic). There will always be a need to ensure that reserve levels are strong when public funding rounds are heavily influenced by cyclical economic circumstances. Reserve levels are only available as one-off sources of finance and cannot be relied upon to balance future budgets except on a temporary basis. The Authority's ability to make use of the Prudential Borrowing powers is also significantly helpful in achieving invest-to-save proposals, ensuring that access to capital finance allows sensible investment decisions to proceed.

Are there any corporate implications members should be concerned about?

40. **Financial:**

The financial implications are contained in the main body of the report.

41. **Risk Management:**

Clause 25 of Part 2 of the Local Government Act 2003 also requires the Chief Finance Officer to report to Members, when calculating the net budget requirement, to advise on the robustness of the estimates made. Relevant factors include the previous year's outturn; pay & price increases; pension contributions; the revenue impact of capital investment; realistic income assumptions; the internal financial control environment; audit conclusions; and the overall public sector financing climate. Part of this assurance is gained from the Annual Governance Statement, the Risk Register reported quarterly, the Head of Finance's involvement in all financial planning matters, and other relevant discussions with the Management Team.

The 2022/23 budget has been set based on savings taken in the 2021/22 budget and on on-going financial restraint. The Authority remains vulnerable to increases in pay, inflation and other unavoidable costs and continued uncertainty over its National Park Grant provision. When the NPG settlement is known the MTFP can be revised as appropriate.

The Moors for the Future team's continuing ability to handle very significant project expenditure remains important, in order to meet grant and contractual conditions, and to finance its core team.

42. **Sustainability:**

The 2022/23 revenue budget and MTFP are key documents to ensure the financial sustainability of the Authority.

43. **Equality:**
Any issues of equality are included within the budget setting process.
44. **Climate Change:**
Any issues relating to climate change are included within the budget setting process.
45. **Background papers** (not previously published)
None

Appendices –

Appendix 1a – Revenue Budget 2022/23
Appendix 1b – Explanation of Appendix 1a
Appendix 2 – Capital Programme 2022/23
Appendix 3 – Investment Projects list
Appendix 4 – Decision Timetable

Report Author, Job Title and Publication Date

Justine Wells, Head of Finance and Chief Finance Officer, 27 January 2022

2022/23 REVENUE BUDGET

NB there may be small rounding errors in totals

APPENDIX 1a

| £000's | A | B | C | D | E | F | G | H | I | J | K | L | | M | N |
|---|-----------------|------------------|-----------|--|---|---------------|-----------------------------------|--------------|--------------|------------|--------------------|---------------------------------------|---|--------------------------|----------------------|
| | Permanent Staff | Fixed Term Staff | Total Pay | Indirect Staff/ Premises/ Travel / other costs | Supplies and Services/ Programme Expenditure | Total Non Pay | Sales, Rents, Fees and Charges | Other Income | Total Income | Net Budget | Net Budget 2021/22 | Difference between years Plus (Minus) | Main Reason for Difference | Support Service Recharge | Net Cost of Services |
| Rural Economy | 163 | 19 | 182 | 7 | 83 | 91 | (8) | (19) | (27) | 246 | 253 | (7) | | 105 | 351 |
| Woodlands | 0 | 0 | 0 | 24 | 1 | 25 | (5) | (1) | (5) | 20 | 41 | (22) | Movement of pay costs to Asset Management Central Team | 19 | 39 |
| Natural Environment | 183 | 0 | 183 | 5 | 4 | 10 | 0 | 0 | 0 | 192 | 187 | 6 | | 82 | 274 |
| Warslow Estate | 17 | 0 | 17 | 195 | 25 | 220 | (227) | (113) | (340) | (103) | (51) | (52) | Movement of pay costs to Asset Management Central Team | 82 | (21) |
| Eastern Moors Estate | 0 | 0 | 0 | 0 | 50 | 50 | (23) | 0 | (23) | 27 | 27 | 0 | | 3 | 30 |
| | | | | | | | | | | | | | £75k increase in income offset by £30k increase in non pay for additional business on income generating activites | 116 | (24) |
| North Lees Estate | 51 | 9 | 60 | 82 | 25 | 107 | (301) | (6) | (307) | (140) | (90) | (50) | | 5 | (2) |
| Minor Properties | 0 | 0 | 0 | 16 | 0 | 16 | (15) | (9) | (23) | (7) | (7) | 0 | | 90 | 355 |
| Cultural Heritage | 254 | 0 | 254 | 5 | 15 | 20 | (1) | (9) | (10) | 265 | 256 | 9 | | 96 | 140 |
| Planning Service: Admin | 58 | 0 | 58 | 1 | 0 | 1 | (15) | 0 | (15) | 44 | 43 | 2 | Team restructure as a result of previous year's management team restructure | 315 | 465 |
| Planning Service: Area Planners | 443 | 0 | 443 | 16 | 31 | 47 | (341) | 0 | (341) | 150 | 88 | 62 | | 205 | 386 |
| P.S: Monitoring & Enforcement | 178 | 0 | 178 | 3 | 0 | 3 | 0 | 0 | 0 | 181 | 174 | 6 | | 239 | 441 |
| Planning Service: Minerals | 238 | 0 | 238 | 2 | 1 | 4 | (40) | 0 | (40) | 202 | 203 | (1) | Movement of pay and non-pay costs to Asset Management Central Team | 0 | 0 |
| Rural Surveyors / Strategic Property Projects | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 70 | (70) | | 0 | 0 |
| Moors for the Future projects | 0 | 1,142 | 1,142 | 0 | 325 | 325 | 0 | (1,467) | (1,467) | 0 | 0 | 0 | | 0 | 0 |
| Moors for the Future Centre | 0 | 0 | 0 | 61 | 0 | 61 | (3) | (2) | (4) | 57 | 57 | 0 | | 7 | 64 |
| Landscape Enhancement Project | 0 | 0 | 0 | 0 | 65 | 65 | (65) | 0 | (65) | 0 | 0 | 0 | | 14 | 14 |
| South West Peak Project | 0 | 27 | 27 | 103 | 50 | 153 | 0 | (180) | (180) | 0 | 0 | 0 | | 151 | 151 |
| Farming in Protected Landscapes | 0 | 75 | 75 | 2 | 1,224 | 1,226 | 0 | (1,301) | (1,301) | (0) | | (0) | | 0 | (0) |
| Moors for the Future core team | 223 | 0 | 223 | 49 | 1 | 50 | 0 | (194) | (194) | 79 | 102 | (22) | Planned reduction in contribution | 397 | 476 |
| | 1,809 | 1,272 | 3,081 | 572 | 1,902 | 2,474 | (1,042) | (3,301) | (4,343) | 1,212 | 1,353 | (140) | | 1,926 | 3,138 |
| A National Park loved & supported | | | | | | | | | | | | | | | |
| Pennine Way | 0 | 26 | 26 | 8 | 2 | 10 | 0 | (38) | (38) | (1) | 0 | (1) | | 11 | 10 |
| Access & Rights of Way | 104 | 0 | 104 | 8 | 18 | 26 | (3) | (4) | (7) | 123 | 121 | 2 | | 57 | 180 |
| Volunteers (PPCV) | 76 | 0 | 76 | 25 | 18 | 43 | (22) | (32) | (54) | 65 | 69 | (4) | | 62 | 127 |
| Trails | 89 | 0 | 89 | 234 | 54 | 288 | (284) | (7) | (292) | 85 | 122 | (37) | Movement of pay costs to Asset Management Central Team | 116 | 201 |
| Asset Management Team | 239 | 0 | 239 | 7 | 1 | 8 | 0 | 0 | 0 | 247 | 56 | 191 | Movement of pay costs to Asset Management Central Team | 0 | 247 |
| non-Estate Car Parks & Concessions | 0 | 0 | 0 | 40 | 12 | 52 | (123) | (1) | (124) | (72) | (73) | 2 | | 21 | (51) |
| non-Estate Toilets | 35 | 0 | 35 | 74 | 13 | 87 | (12) | (8) | (20) | 102 | 103 | (1) | | 48 | 150 |
| Recreation Minor Properties | 0 | 0 | 0 | 22 | 3 | 24 | (26) | 0 | (26) | (2) | (2) | 0 | | 21 | 19 |
| | | | | | | | | | | | | | Now showing Visitor Centres and Cycle Hire separately. Pay increased due to pay grade re-alignment. | 179 | 437 |
| Visitor Centres | 398 | 0 | 398 | 130 | 273 | 403 | (529) | (14) | (543) | 258 | 223 | 35 | Now showing Visitor Centres and Cycle Hire separately. Pay increased due to pay grade re-alignment. | 58 | 5 |
| Cycle Hire | 210 | 0 | 210 | 18 | 35 | 53 | (314) | (1) | (315) | (53) | (62) | 9 | | 52 | 136 |
| Fundraising Development | 46 | 17 | 63 | 3 | 98 | 101 | 0 | (80) | (80) | 84 | 83 | 1 | | 77 | 272 |
| Marketing Communications | 170 | 0 | 170 | 9 | 16 | 25 | 0 | 0 | 0 | 195 | 209 | (14) | Pay reductions due to restructure in the team | 349 | 1,062 |
| Engagement Rangers | 769 | 2 | 770 | 173 | 51 | 224 | (56) | (226) | (282) | 713 | 686 | 26 | Pay award and NI increases | 41 | 182 |
| Maintenance & Projects Team | 171 | 0 | 171 | 59 | 17 | 77 | (0) | (107) | (107) | 141 | 133 | 7 | Functional Savings removal of temporary post | | |
| Projects | | | | | | | | | | | | | | | |
| Recreation Projects | 0 | 0 | 0 | 0 | 26 | 26 | 0 | (50) | (50) | (24) | (24) | 0 | | 23 | (1) |
| The Access Fund | 0 | 0 | 0 | 19 | 0 | 19 | 0 | (13) | (13) | 7 | 0 | 7 | | | |
| | 2,306 | 45 | 2,351 | 830 | 637 | 1,467 | (1,369) | (581) | (1,950) | 1,868 | 1,644 | 223 | | 1,115 | 2,976 |
| Thriving Sustainable Communities | | | | | | | | | | | | | | | |
| Community Policy Planner | 29 | 0 | 29 | 0 | 0 | 0 | 0 | 0 | 0 | 29 | 34 | (5) | Team restructure as a result of previous year's management team restructure | 7 | 36 |
| Planning Policy | 141 | 0 | 141 | 8 | 22 | 30 | 0 | 0 | 0 | 171 | 154 | 17 | | 71 | 242 |
| Transport Policy | 44 | 0 | 44 | 4 | 10 | 15 | 0 | 0 | 0 | 59 | 57 | 1 | | 30 | 89 |
| | 214 | 0 | 214 | 13 | 32 | 45 | 0 | 0 | 0 | 258 | 246 | 13 | | 108 | 366 |

| Agile & Efficient Organisation | | | | | | | | | | | | | | | |
|----------------------------------|-------|-------|-------|-------|-------|-------|---------|---------|---------|-------|-------|------|---|---------|-------|
| Property Support Team | 214 | 0 | 214 | 10 | 8 | 17 | 0 | 0 | 0 | 231 | 195 | 36 | Movement of pay costs from Aldern House to Property Support Team | (231) | (0) |
| Property: Aldern House HQ | 0 | 0 | 0 | 227 | 9 | 236 | (45) | (17) | (62) | 173 | 208 | (35) | Movement of pay costs from Aldern House to Property Support Team | (173) | 0 |
| Corporate Strategy | 183 | 0 | 183 | 4 | 21 | 25 | 0 | 0 | 0 | 208 | 202 | 6 | Team | (208) | 0 |
| Legal Services | 229 | 0 | 229 | 6 | 48 | 54 | (7) | 0 | (7) | 276 | 271 | 5 | | (276) | (0) |
| Democratic Services | 153 | 0 | 153 | 5 | 16 | 20 | 0 | 0 | 0 | 174 | 143 | 30 | Team restructure | (143) | 31 |
| Members | 0 | 0 | 0 | 3 | 111 | 114 | 0 | 0 | 0 | 114 | 114 | 0 | | (114) | 0 |
| Information Management | 333 | 0 | 333 | 8 | 330 | 338 | 0 | 0 | 0 | 671 | 644 | 27 | Team restructure as a result of previous year's management team restructure | (670) | 1 |
| Customer & Business Support Team | 401 | 0 | 401 | 4 | 23 | 27 | (0) | (8) | (8) | 420 | 406 | 14 | Pay award and NI increases | (420) | (0) |
| Finance | 230 | 0 | 230 | 1 | 96 | 96 | 0 | 0 | 0 | 327 | 289 | 38 | Team restructure and £5k for external audit fees | (322) | 5 |
| Contingency/ inflation costs | 150 | 0 | 150 | 20 | 0 | 20 | 0 | 0 | 0 | 170 | 229 | (59) | Reduction in need for contingency for VAT and pay realignment | (175) | (5) |
| Corporate Management | 136 | 30 | 166 | 59 | 66 | 125 | 0 | 0 | 0 | 291 | 280 | 11 | Pay award and NI increases | (291) | 0 |
| Corporate overhead fund | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (152) | (152) | (152) | (91) | (61) | SWP finishing in 2022/23 | 152 | (0) |
| People Management | 224 | 0 | 224 | 42 | 21 | 63 | 0 | (9) | (9) | 278 | 267 | 11 | Team restructure | (278) | (0) |
| Projects | | | | | | | | | | | | | | | |
| | 2,253 | 30 | 2,283 | 389 | 748 | 1,136 | (53) | (186) | (239) | 3,180 | 3,157 | 23 | | (3,149) | 31 |
| Total | 6,582 | 1,347 | 7,929 | 1,804 | 3,318 | 5,122 | (2,464) | (4,068) | (6,532) | 6,518 | 6,400 | 118 | | 0 | 6,512 |

Financing

| | |
|--|-------|
| Net Cost of Services | 6,518 |
| Central Debt Charges | 47 |
| Net Revenue Expenditure | 6,565 |
| Funded by:- | |
| NPG @ 0% increase | 6,699 |
| Other Reserves | 57 |
| Interest on balances | 15 |
| Total | 6,770 |
| Surplus to /(deficit from) general reserve | 205 |

Explanation of Baseline spreadsheet (Appendix 1a)

APPENDIX 1b

Income and Expenditure

Only revenue income & expenditure passing through the Authority's accounts is shown here. Therefore, leverage of others' funds (e.g. economic income) and capital items are not shown.

Rows

These represent each service broken down into its principal activity (department on the accounting system). The services are grouped into the relevant corporate strategy heading. Initials of the accountable officers are shown.

Columns

The columns are provided to help understand how costs are allocated within each activity area.

Pay

- A Establishment pay shows the full salary cost of permanent staff
- B Establishment pay shows the full salary cost of temporary and fixed term staff
- C Total staff costs (sum of A&B)

Expenditure

- D The cost of travel claims, premises related items, transport costs for vehicles, and office and field running costs.
- E The cost of supplies and services which includes programme expenditure, cost of sales, and other expenses.
- F The Total of non-pay expenditure (sum of D&E)

Income

- G Charge-driven income (sales, fees and charges)
- H Other income (e.g. recurring grants, partnership contributions, external grant aid)
- I Total income (sum of G&H)

Net Budget

- J The net service baseline budget; consequently a cost supported by National Park Grant.

Financing Box at bottom

This shows how the total net baseline budget in column J is financed by National Park Grant, interest receipts and any reserve contributions. For convenience, any central debt charges not allocated to services are shown here. Any surplus or deficit after the above is taken into account represents the sum added to or subtracted from the General Reserve.

Further columns

- K This column shows last year's approved budget for comparison purposes.
- L This column shows the difference between the years (Col J minus K) with a brief explanation of any difference in the text alongside. Minor differences are usually due to general pay/non-pay inflation costs and are not explained.
- M This column shows the allocation of the cost of support services within the Corporate and Democratic Core to front line services.
- N This column shows the total net cost of services with the value of the support services included (Column J plus M)

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2022/23 Capital Programme (£'000)

| | New | Approved | Total |
|---|------------|-----------------|--------------|
| <u>Acquisition of Land and Existing Buildings</u> | 0 | 0 | 0 |
| <u>New Construction, conversion and Renovation</u> | | | |
| Conservation Properties (RMM8/19)(RMM17/19) (RMM2/20b) | 0 | 210 | 210 |
| Structures (ARP 51/16)(Authority 16/19) | 0 | 0 | 0 |
| Campsites | 0 | 229 | 229 |
| Visitor Centres | 0 | 22 | 22 |
| North Lees | 0 | | 0 |
| <u>Vehicles, Plant, Equipment and Machinery</u> | | | |
| Desktop/laptop purchases 4 yearly replacement | 65 | 0 | 65 |
| Vehicle purchases (ARP 04/19) | 0 | 48 | 48 |
| Wigginstall Cottage ASHP | 0 | | 0 |
| <u>Intangible Fixed Assets</u> | 0 | 0 | 0 |
| Total Capital Expenditure | 65 | 509 | 574 |
| <u>Financed by</u> | | | |
| Capital Grants | 0 | 0 | 0 |
| Borrowing | | | |
| Public Works Loan Board / Internal Borrowing | 0 | 447 | 447 |
| Reserves | | | |
| Capital Receipts Reserve | 0 | 40 | 40 |
| Other Reserves | 0 | 22 | 22 |
| Financed from Revenue Account | 65 | 0 | 65 |
| Total Financing | 65 | 509 | 574 |

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| Title | £ | Key Area |
|---|----------------|--------------------|
| Replacement of Microphones and Broadcasting Equipment used for Committee and Other Meetings | 61,482 | Digital Investment |
| CEO Recruitment | 40,300 | People |
| Equality, Diversity and Inclusion Recruitment | | |
| Advertising | 6,000 | People |
| One Team Engagement and Recognition | 10,415 | People |
| Equality, Diversity and Inclusion Awareness Resources for Volunteers | 10,000 | People |
| Family Volunteering Project | 4,000 | People |
| Nature Recovery Data Plan | 32,177 | Digital Investment |
| Bidding Support for Nature for Climate Change | 28,814 | Fundraising |
| Project Management Engagement Team | 33,735 | People |
| Restarting the Building Blocks Project | 80,000 | Fundraising |
| Mechanical Ventilation for the Boardroom | 20,000 | Assets |
| Total | 326,923 | |

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| Decisions Timetable | | January | February | March | April | May | June | July | August | September | October | November | December |
|--|-------------------------|-------------------|-------------------|-----------------|-----------------|---------------|---------------|----------------|-----------------|---------------------|-------------------|--------------------|-------------------|
| <div> <div></div> <div>IT Investment</div> <div>Fundraising Investment</div> <div>Asset Maintenance Investment</div> <div>Pay Strategy</div> <div>National Park Management Plan</div> </div> | National Park Authority | 7th January 2022 | 4th February 2022 | 18th March 2022 | - | 20th May 2022 | | 1st July 2022 | | | | | |
| | P & R Committee | 21st January 2022 | - | 4th March 2022 | 29th April 2022 | - | - | 22nd July 2022 | - | 2nd September 2022 | - | 11th November 2022 | - |
| | RMM | 11th January 2022 | 8th February 2022 | 8th March 2022 | 19th April 2022 | 3rd May 2022 | 7th June 2022 | 15th July 2022 | - | 30th September 2022 | - | - | 2nd December 2022 |
| | Management Team | 11th January 2022 | 8th February 2022 | 8th March 2022 | 19th April 2022 | 3rd May 2022 | 7th June 2022 | 5th July 2022 | 2nd August 2022 | 6th September 2022 | 18th October 2022 | 8th November 2022 | 6th December 2022 |
| | Budget Monitoring | - | - | 4th March 2022 | - | 6th May 2022 | - | - | 2nd August 2022 | 6th September 2022 | 18th October 2022 | 8th November 2022 | 6th December 2022 |
| | | | | | | | | | | | | 11th November 2022 | - |
| | | | | | | Outturn | | Audit | | | | | |

| MTFP - Timetable | January | February | March | April | May | June |
|-------------------------|---|--|--|---|---|---|
| National Park Authority | - | Budget 2022/23 Capital Programme 2022/23 MTFP 2022/23 to 2024/25 | Treasury Management Policy | - | Outturn and Slippage | - |
| RMM | Budget 2022/23 Capital Programme 2022/23 MTFP 2022/23 to 2025/26 Decisions on options for: Asset Maintenance Pay Strategy | Treasury Management Policy Digital Investment - Initial Range of Options/ Costs Decisions on options for: Fundraising | Decisions on options for: Digital Investment | Cost reduction planning 2023/24 onwards | Cost reduction planning 2023/24 onwards Outturn and Slippage | Cost reduction planning 2023/24 onwards |
| Management Team | - | - | - | Estimated Outturn and Slippage | Cost reduction planning 2023/24 onwards | Cost reduction planning 2023/24 onwards |

| Month | July | August | September | October | November | December |
|-------------------------|--|---|--|--|---|----------|
| National Park Authority | - | - | - | - | MTFP - Plan to balance the budget 2023/24 onwards | - |
| Members Workshops | - | - | Plan to balance the budget Capital Strategy | Plan to balance the budget Capital Strategy | Plan to balance the budget Capital Strategy | - |
| RMM | Cost reduction planning 2023/24 onwards | Decisions: Plan to balance the budget | Decisions: Plan to balance the budget | Decisions: Plan to balance the budget | - | - |
| Management Team | Plan to balance the budget | - | - | - | - | - |

8. **EXTERNAL AUDIT (Mazars): 2020/21 ANNUAL AUDIT REPORT (JW)**

Purpose of the report

1. This report asks Members to consider the External Auditor's 2020/21 Annual Audit Report.

Key issues

2. Key issues include:
- The Annual Audit Report provides a summary of the Value for Money (VFM) results of the external audit for 2020/21.
 - The External Auditor issued an addendum to the Audit Completion Report presented to Members on 12th November 2022 attached as Appendix 2.

Recommendations

3. 1. **That the 2020/21 Annual Audit Report at Appendix 1 be considered and acknowledged**
2. **Members note the Addendum to Audit Completion Report at Appendix 2 and the receipt of an unqualified audit opinion on the Statement of Accounts 2020/21.**

How does this contribute to our policies and legal obligations?

4. The work of the external auditors is a key part of our governance arrangements, helping us to monitor and improve performance to ensure the Authority has a solid foundation. It supports achievement of the 2019-2024 Corporate Strategy - that we have arrangements in place to secure economy, efficiency and effectiveness in all our operations (KPI22).

Achieving an unqualified opinion on the financial statements and satisfying the Auditor that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources are corporate performance indicators.

Background

5. The duties and powers of auditors are set out in the Local Audit and Accountability Act 2014, the Local Government Act 1999, the Statement of Responsibilities of Auditors and Audited Bodies and the Code of Audit Practice. The Authority meeting considers the Auditor's Annual Report as part of its work programme.

Proposals

6. The full report for consideration is given at Appendix 1.
7. For the 2020/21 Statement of Accounts the Code of Audit Practice changed the work required for Auditors to comment on the value for money arrangements of the Authority. The Auditors are now required to report on significant weaknesses in the Authority's arrangements for securing economy, efficiency and effectiveness in use of resources instead of reporting a form of conclusions. The three criteria in the new Code of Practice are financial sustainability, governance and improving economy, efficiency and effectiveness. The report has found no risk or actual significant weaknesses in the Authority's VFM arrangements.

8. The Auditors have been required to complete additional work to enable them to issue their opinion on VFM, this was notified to the Authority and Members in February 2021. The Annual Audit Report includes the breakdown of additional fees at page 16 and are estimated to be £9k on top of the agreed scale fee of £10k. This was included in the 2021/22 budget.
9. The External Auditors issued the signed Auditor's report on the Statement of Accounts for 2020/21 on 30th November 2021 and this was incorporated into the signed statement of accounts which is now published on the Authority's website [Statement-of-Accounts-24-11-2021-Redacted.pdf \(peakdistrict.gov.uk\)](#). There were no changes required to the final accounts presented to Members on 12th November 2021.

Are there any corporate implications members should be concerned about?

10. **Financial:** The fees of £19k for external audit are funded from the existing Finance Service budget as allowed for in the 2021/22 budget.
11. **Risk Management:**
The scrutiny and advice provided by external audit is part of our governance framework. The Auditor's work is based on an assessment of audit risk.
12. **Sustainability:**
There are no issues to highlight
13. **Equality:**
There are no issues to highlight
14. **Climate Change:**
There are no issues to highlight
15. **Background papers** (not previously published) – None
16. **Appendices:**
Appendix 1: External Audit: 2020/21 Annual Audit Report
Appendix 2: External Audit Addendum to ACR Letter

Report Author, Job Title and Publication Date

Justine Wells, Head of Finance, 27 January 2022

Auditor's Annual Report

Peak District National Park Authority—
year ended 31 March 2021

January 2022



- 01 Introduction
- 02 Audit of the financial statements
- 03 Commentary on VFM arrangements
- 04 Other reporting responsibilities

Our reports are prepared in the context of the 'Statement of responsibilities of auditors and audited bodies' issued by Public Sector Audit Appointments Ltd. Reports and letters prepared by appointed auditors and addressed to members or officers are prepared for the sole use of the Authority. No responsibility is accepted to any member or officer in their individual capacity or to any third party.

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01

Section 01: **Introduction**

Introduction

Purpose of the Auditor’s Annual Report

Our Auditor’s Annual Report (AAR) summarises the work we have undertaken as the auditor for Peak District National Park Authority (‘the Authority’) for the year ended 31 March 2021. Although this report is addressed to the Authority, it is designed to be read by a wider audience including members of the public and other external stakeholders.

Our responsibilities are defined by the Local Audit and Accountability Act 2014 and the Code of Audit Practice (‘the Code’) issued by the National Audit Office (‘the NAO’). The remaining sections of the AAR outline how we have discharged these responsibilities and the findings from our work. These are summarised below.



Opinion on the financial statements

We issued our audit report on 30 November 2021. Our opinion on the financial statements was unqualified.



Value for Money arrangements

In our audit report issued we reported that we had not completed our work on the Authority’s arrangements to secure economy, efficiency and effectiveness in its use of resources and had not issued recommendations in relation to identified significant weaknesses in those arrangements at the time of reporting. Section 3 confirms that we have now completed this work and provides our commentary on the Authority’s arrangements.



Wider reporting responsibilities

We have not yet received group instructions from the National Audit Office confirming their requirements in relation to the Authority’s Whole of Government Accounts. We are unable to issue our audit certificate until this is formally confirmed.

The 2014 Act requires us to give an elector, or any representative of the elector, the opportunity to question us about the accounting records of the Authority and to consider any objection made to the accounts. We did not receive any questions or objections in respect of the Authority’s financial statements.



02

Section 02:

Audit of the financial statements

The scope of our audit and the results of our opinion

During the course of the audit we had the full co-operation of management. The audit was again carried out remotely but there were no significant difficulties in carrying out our normal audit procedures and obtaining the audit evidence required to complete the audit. We are grateful for the co-operation and support provided by management.

Our audit was conducted in accordance with the requirements of the Code, and International Standards on Auditing (ISAs).

The purpose of our audit is to provide reasonable assurance to users that the financial statements are free from material error. We do this by expressing an opinion on whether the statements are prepared, in all material respects, in line with the financial reporting framework applicable to the Authority and whether they give a true and fair view of the Authority's financial position as at 31 March 2021 and of its financial performance for the year then ended.

Our audit report, issued on 30 November 2021 gave an unqualified opinion on the financial statements for the year ended 31 March 2021 and confirmed that, in our opinion, the financial statements:

- give a true and fair view of the financial position of the Authority as at 31st March 2021 and of its expenditure and income for the year then ended; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

03

Section 03:

Commentary on VFM arrangements

Approach to Value for Money arrangements work

We are required to consider whether the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. The NAO issues guidance to auditors that underpins the work we are required to carry out and sets out the reporting criteria that we are required to consider. The reporting criteria are:

- **Financial sustainability** - How the Authority plans and manages its resources to ensure it can continue to deliver its services
- **Governance** - How the Authority ensures that it makes informed decisions and properly manages its risks
- **Improving economy, efficiency and effectiveness** - How the Authority uses information about its costs and performance to improve the way it manages and delivers its services

At the planning stage of the audit, we undertake work so we can understand the arrangements that the

Authority has in place under each of the reporting criteria; as part of this work we may identify risks of significant weaknesses in those arrangements.

Where we identify significant risks, we design a programme of work (risk-based procedures) to enable us to decide whether there is a significant weakness in arrangements. Although we describe this work as planning work, we keep our understanding of arrangements under review and update our risk assessment throughout the audit to reflect emerging issues that may suggest there are further risks of significant weaknesses.

Where our risk-based procedures identify actual significant weaknesses in arrangements, we are required to report these and make recommendations for improvement.

The table below summarises the outcomes of our work against each reporting criteria. We did not identify any risks of significant weakness, or actual significant weakness, in the Authority’s arrangements. On the following page we outline further detail of the work we have undertaken against each reporting criteria, including the judgements we have applied.

| Reporting criteria | Commentary page reference | Risks of significant weaknesses in arrangements identified? | Actual significant weaknesses in arrangements identified? |
|---|---------------------------|---|---|
| Financial sustainability | 9-10 | No | No |
| Governance | 11-12 | No | No |
| Improving economy, efficiency and effectiveness | 13 | No | No |

3. VFM arrangements – Financial Sustainability

Overall commentary on the Financial Sustainability reporting criteria

Background to the Authority’s operating environment in 2020/21

The Authority entered 2020/21 at the start of the national lockdown, and faced a significant operational impact from the effects of the pandemic. In response to the Covid-19 pandemic, central government made a series of policy announcements, a number of which have impacted on park authorities such as PDNPA. During the 2020/21 year the Authority dealt with a wide range of issues to support park users.

2020/21 Financial statement performance

We have carried out a high level analysis of the audited financial statements, including the Balance Sheet and Movement in Reserves Statement and the Balance Sheet.

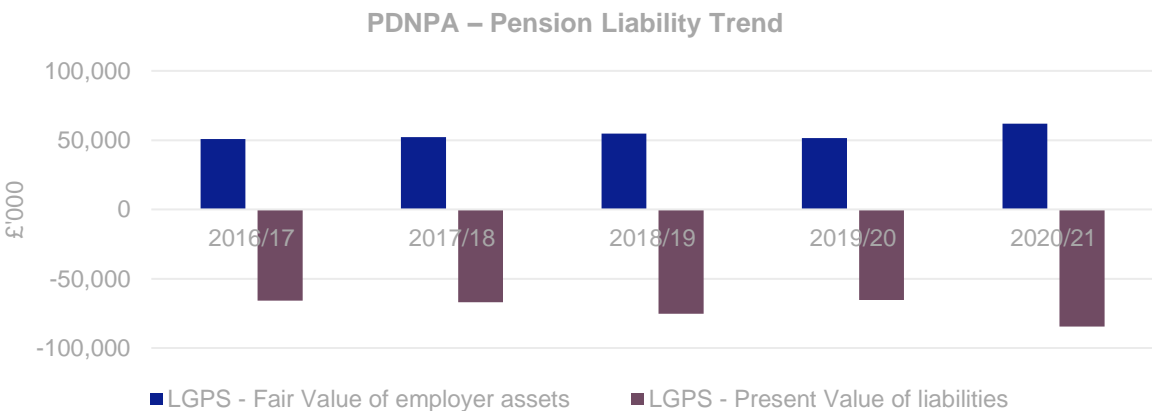
The financial position projected through the Authority's balance sheet does not give us cause for concern.

The Authority’s net current asset position (being current assets less current liabilities) has increased by £0.9m from £6.9m to £7.8m.

The most significant change in the balance sheet relates to movements in the Authority’s share of the pension fund net liability (being a deficit position) of £22.6m, up from £13.8m in the prior year as shown in Note 32 of the financial statements. The main movements being:

- an increase in the value of pension assets from £51.5m to £61.9m
- offset by a larger increase in the value of pension liabilities from £65.3m to £84.5m..

In the past few years, it is not unusual to see material movements in the net pension liability and this is consistent with our experience at other councils. We have tracked the movement in the net pension liability over a five year period to illustrate the changes.



Reserves

The Authority’s useable reserves have increased from £6.4m to £6.6m in 2020/21, with:

- General Fund & Earmarked Reserves of £5.7m, up from £5.1m in the prior year
- Capital Reserves of £0.9m, down from £1.3m in 2019/20 in line with funding of capital expenditure. Our testing of PPE Additions found no material issues arising over the £1.1m additions to Property, Plant & Equipment set out in Note 28 of the financial statements.

The Authority’s reserves position does not indicate a risk of significant weakness in VFM arrangements for financial sustainability.

The Authority will need to continue to ensure that any use of reserves to smooth the financial position over the next few years is properly planned and the use of reserves cannot be relied on to provide a long term solution to funding gaps. Notwithstanding this, our work has not highlighted a risk of significant weakness in the Authority’s arrangements for ensuring financial sustainability.

VFM arrangements – Financial Sustainability

Overall commentary on the Financial Sustainability reporting criteria (continued)

Financial planning and monitoring arrangements

In February 2020 the Authority issued a balanced budget for the 2020/21 financial year. During the year, the financial position was monitored by the Resource Management Meeting (RMM) and the Authority received regular reports on financial performance to assist in monitoring the financial position.

A detailed financial commentary on the 2020/21 results was reported to the Authority meeting on the 21st May 2021 where Mazars was present to witness the presentation. We reviewed this report, which contains details on any significant variances to budget in sufficient detail to enable both the RMM and Authority understand financial performance and take action as required. The final underspend after slippage requests and appropriations to and from reserves was £275k. As explained in the report, the main cause of underspend was within an underspend of £146k in the Planning Service because of a large number of vacant posts in the Monitoring and Enforcement and Minerals Teams.

We have not identified any risks of a significant weakness in arrangements for financial planning and monitoring.

Arrangements for the identification, management and monitoring of funding gaps and savings

The arrangements in place for budget setting and updating the Medium Term Financial Strategy (MTFS) are as expected for a park authority with arrangements for the evaluation of financial risk, alignment to the corporate plan and sources of funding.

Each head of service supports the development of the budget, identifying cost pressures and delivery needs within the corporate plan before presenting a combined report on the budget and MTFS for the Authority. This includes workforce, pay and the capital programme, including capital financing and capital financing charges that impact the revenue budget.

A vacancy control process which was established in 2020/21 has also had an impact on the outturn with an overall underspend in pay across the Authority. This was created to give RMM oversight of all vacancies during an uncertain year with both the impacts of the coronavirus pandemic and the future budget savings that were

required.

There is no indication that the Authority's MTFS and budget setting is not aligned to supporting plans given the Authority has a track record of delivering against budget, with some variation this year due to the unpredictability arising from covid.

Based on the above considerations we are satisfied there is not a significant weakness in the Authority's arrangements in relation to financial sustainability.

3. VFM arrangements – Governance

Overall commentary on the Governance reporting criteria

Governance and decision making arrangements

We have reviewed Authority and Committee Reports and minutes during the year as well as key documents in relation to how the Authority ensures that it makes informed decisions and properly manages its risks.

The Authority has a full suite of governance arrangements in place, including an approved constitution that is regularly reviewed and updated. The Constitution explains how the Authority operates and makes decisions. It ensures that the Authority is efficient, transparent and accountable for what it does.

We consider the committee structure of the Authority is sufficient to provide assurance that decision making, risk and performance management is subject to appropriate levels of oversight and challenge.

Our review of Committee papers confirms that a template covering report is used, ensuring the purpose, consultation, and recommendations are clear. Minutes are published and subsequently approved to evidence the matters discussed, challenge and decisions made.

The Authority's Ethical Framework is the set of rules and procedures which set out the standards of behaviour that the Authority expects of its Members and employees. It also deals with the way in which Members and employees should relate to one another.

The Ethical Framework is made up of the following documents:

- Standing Orders
- The Code of Conduct for Members
- The Protocol for Member/Employee Relations
- The Code of Conduct for Employees
- The Local Code of Corporate Governance

The Authority's Code of Corporate Governance sets out what it will do to achieve this and follows the principles and framework recommended for local government. Each year the Authority reviews its performance against this Code so that it can continuously improve effectiveness and address any weakness highlighted. In doing this it takes into account feedback and reports from independent advisors like internal auditors and the local government ombudsman. This review feeds into the Annual Governance Statement (AGS).

The Authority does not have a separate Audit Committee, with those functions taken at full Authority level, including responsibility for establishing and maintaining an effective system of governance in a way that supports the organisation's objectives. We have reviewed supporting documents and confirmed the Authority meets regularly and reviews its programme of work to maintain focus on key aspects of governance and internal control. Our attendance at meetings has confirmed there is an appropriate level of effective challenge.

The Authority's governance arrangements are set out in the Annual Governance Statement (AGS), which is reviewed as part of our audit where we confirmed they were consistent with our understanding of the Authority's arrangements in place. These arrangements are deemed adequate with no indication of a significant weakness in arrangements.

VFM arrangements – Governance

Overall commentary on the Governance reporting criteria

Risk management and monitoring arrangements

The Authority is responsible for overseeing the effectiveness of risk management arrangements, challenging risk information. We have reviewed minutes of the Authority to confirm Members have reviewed the Strategic Risk Register during the year.

Our review of minutes above, as well as our attendance at committee meetings where the strategic risk register has been presented, demonstrates a process of following the steps in the Risk Management strategy and evidence of adequate arrangements in place.

In order to provide assurance over the effective operation of internal controls, including arrangements to prevent and detect fraud, the Authority has an Internal Audit service that agrees an annual Internal Audit plan with management at the start of the financial year. Internal Audit reports are regularly presented to the Authority and from our attendance at meetings, we are satisfied this allows the Authority to effectively hold management to account.

At the end of each financial year the Head of Internal Audit provides an opinion based on the work completed during the year. We reviewed the Internal Audit's annual opinion which is provided to the Authority and supports the Annual Governance Statement. We have confirmed that the HOIA opinion has been adequately reflected in the Annual Governance Statement to provide assurance that there is no significant weakness in arrangements for 2020/21.

Throughout the year we have attended Authority meetings. Through attendance at these meetings we have confirmed that the committee receive regular updates on both internal audit progress and risk management in the form of risk registers. We have seen active member engagement from in challenging the papers and reports which they receive from officers, internal audit and external audit.

Arrangements and approach to 2021/22 financial planning

We reviewed the Medium Term Financial Strategy presented to the Authority in February 2021 covering the period 2021/22 to 2024/25. In doing so, we noted, the report and financial risks is clearly laid out, with sufficient

detail to explain the sources of funding and areas of spend. We considered the main assumptions supporting the MTFS and are satisfied these are not unreasonable.

We considered the impact of budget decisions on the reserves, which indicates a reduction in reserves at 2022 to £5.2m.

We also considered the savings required to maintain a balanced budget, which is £nil in 2021/22, £179k in 2022/23; £354k in 2023/24; and £529k in 2024/25. A savings plan is in place to address the gap, which includes c£320k from the management restructure.

Overall, we are satisfied in the arrangements to develop the MTFS and have not identified any significant weaknesses in arrangements.

Regulators

There are few external regulators for Authority's and we have not identified any matters reported which indicate significant weaknesses in the Authority's governance arrangements.

Based on the above considerations we are satisfied there is not a significant weakness in the Authority's arrangements in relation to governance.

3. VFM arrangements – Improving Economy, Efficiency and Effectiveness

Overall commentary on the Improving Economy, Efficiency and Effectiveness reporting criteria

Performance Management

The Authority’s corporate strategy for 2019-24 focuses on enhancement and conservation. It sets the outcomes we want to achieve for the Peak District National Park over this five-year period, as well as aspirations to 2040. It provides the framework to align resources to help achieve this. This corporate strategy shows how the Peak District National Park Authority will contribute to the partnership plan for the place: the Peak District National Park Management Plan 2018-23.

The National Park Management Plan provides the framework that encourages everyone to work together to achieve national park purposes. It is not a plan for an individual organisation or group but a plan for the place. It is, therefore, a partnership plan.

The Authority has in place a performance management framework with processes for regular performance reporting and corrective action if required. The Authority’s budget endeavours to ensure the provision of the appropriate resources required to deliver the Corporate Plan, and the types of action necessary to enable them to be affordable, to allow balanced budgets to be delivered.

The Authority produces a detailed annual report where performance is considered following the year-end. We have reviewed the report presented, in our presence, to the National Park Authority meeting of May 2021. We also reviewed the final published report (“Our achievements in 2020/21 and our ambitions for 2021/22”) which, in our view, adequately sets out the Authority’s progress and achievements of 2020/21 (the second year of the Corporate Strategy 2019-24) and provides a look forward to its ambitions for 2021/22. This report provides the public with an overall assessment of the Authority activities for the financial year

Overall, we believe there is sufficient evidence to demonstrate adequate arrangements for performance monitoring and management at the Authority.

Partnerships

The Authority works work with a vast range of organisations and groups to look after the national park. No matters have been brought to our attention to indicate a risk of significant weakness in arrangements.

Procurement

The Authority has arrangements for standing financial instructions are also controls in place designed to ensure that all procurement activity is conducted with openness, honesty and accountability. Our work on the financial statements has not identified any significant internal control deficiencies.

Based on the above considerations we are satisfied there is not a significant weakness in the Authority’s arrangements in relation to improving economy, efficiency and effectiveness.

04

Section 04:

**Other reporting responsibilities and
our fees**

4. Other reporting responsibilities and our fees

Matters we report by exception

The Local Audit and Accountability Act 2014 provides auditors with specific powers where matters come to our attention that, in their judgement, require specific reporting action to be taken. Auditors have the power to:

- issue a report in the public interest;
- make statutory recommendations that must be considered and responded to publicly;
- apply to the court for a declaration that an item of account is contrary to the law; and
- issue an advisory notice.

We have not exercised any of these statutory reporting powers.

The 2014 Act also gives rights to local electors and other parties, such as the right to ask questions of the auditor and the right to make an objection to an item of account. We did not receive any such objections or questions.

Reporting to the NAO in respect of Whole of Government Accounts consolidation data

We have not yet received group instructions from the National Audit Office confirming their requirements in relation to the Authority's Whole of Government Accounts. We are unable to issue our audit certificate until this is formally confirmed.

Other reporting responsibilities and our fees

Fees for work as the Authority's auditor

We reported our proposed fees for the delivery of our work under the Code of Audit Practice in our Audit Strategy Memorandum and Audit Completion Report. Our current fees estimate is set out below. We will agree the final fee, and any further variations, with management prior to reporting to the Authority.

| Area of work | 2019/20 fees | 2020/21 fees |
|--|----------------|----------------|
| Scale fee in respect of our work under the Code of Audit Practice | £10,209 | £10,209 |
| Additional testing as a result of changes arising from increased audit quality expectations involving the work on the valuation of land and buildings and on the local government pension scheme | £3,518 | £3,518 |
| Additional testing as a result of the implementation of new auditing standards | - | £1,188 |
| Other additional testing - additional testing and consideration of uncertainties in key estimates as a result of Covid-19 | £2,454 | £1,188 |
| Additional work as a result of the new Code of Audit Practice and VFM reporting | - | £3,518 |
| Total fees | £16,181 | £19,122 |

Mark Surridge, Director – Public Services

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Mazars is an internationally integrated partnership, specialising in audit, accountancy, advisory, tax and legal services*. Operating in over 90 countries and territories around the world, we draw on the expertise of 40,400 professionals – 24,400 in Mazars' integrated partnership and 16,000 via the Mazars North America Alliance – to assist clients of all sizes at every stage in their development.

*where permitted under applicable country laws.

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30 November 2021

Dear Members

Conclusion of pending matters – Audit Completion Report for Peak District National Park Authority

Following on from our recent meeting and as required by International Standards on Auditing (UK and Ireland), I am writing to communicate the conclusion of those matters that were marked as outstanding within the Audit Completion Report dated November 2021.

The outstanding matters and the conclusions reached are detailed below:

| Audit area | Status | Description of outstanding matters |
|---|------------|---|
| Whole of Government Accounts (WGA) | Incomplete | The National Audit Office's Group Instructions for local authority 2020/21 audits remain unavailable and consequently WGA return and audit certificate cannot be issued at the present time. We will aim to complete this work as soon as these instructions are available and report on completion. |
| Audit quality control and completion procedures | Complete | We have undertaken the outstanding procedures and received the residual audit documentation required and our work is complete. |

If you wish to discuss these or any other points, then please do not hesitate to contact me.

Yours sincerely

Mark Surridge

Director

For and on behalf of Mazars LLP

Final proposed text of the Audit Report

Independent auditor's report to the members of Peak District National Park Authority

Report on the audit of the financial statements

Opinion on the financial statements

We have audited the financial statements of Peak District National Park Authority ("the Authority") for the year ended 31 March 2021, which comprise the Comprehensive Income and Expenditure Statement, the Movement in Reserves Statement, the Balance Sheet, the Cash Flow Statement, and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

In our opinion, the financial statements:

- give a true and fair view of the financial position of the Authority as at 31st March 2021 and of its expenditure and income for the year then ended; and
- have been properly prepared in accordance with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities section of our report. We are independent of the Authority in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Chief Finance Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Authority's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Chief Finance Officer with respect to going concern are described in the relevant sections of this report.

Other information

The Chief Financial Officer is responsible for the other information. The other information comprises the Annual Governance Statement and information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

The other information comprises the Annual Governance Statement and information included in the Statement of Accounts, other than the financial statements and our auditor's report thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of the Chief Finance Officer for the financial statements

As explained more fully in the Statement of the Chief Finance Officer's Responsibilities, the Chief Finance Officer is responsible for the preparation of the Statement of Accounts, which includes the financial statements, in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21, and for being satisfied that they give a true and fair view. The Chief Finance Officer is also responsible for such internal control as the Chief Finance Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

The Chief Finance Officer is required to comply with the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom 2020/21 and prepare the financial statements on a going concern basis on the assumption that the functions of the Authority will continue in operational existence for the foreseeable future. The Chief Finance Officer is responsible for assessing each year whether or not it is appropriate for the Authority to prepare its accounts on the going concern basis and disclosing, as applicable, matters related to going concern.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. Based on our understanding of the Authority, we identified that the principal risks of non-compliance with laws and regulations related to the Local Government Act 2003 (and associated regulations made under section 21), the Local Government Finance Acts of 1988, 1992 and 2012, and the Accounts and Audit Regulations 2015, and we considered the extent to which non-compliance might have a material effect on the financial statements.

We evaluated the Chief Finance Officer's incentives and opportunities for fraudulent manipulation of the financial statements (including the risk of override of controls) and determined that the principal risks were related to posting manual journal entries to manipulate financial performance, management bias through judgements and assumptions in significant accounting estimates and significant one-off or unusual transactions.

Our audit procedures were designed to respond to those identified risks, including non-compliance with laws and regulations (irregularities) and fraud that are material to the financial statements. Our audit procedures included but were not limited to:

- discussing with management and the Authority the policies and procedures regarding compliance with laws and regulations;
- communicating identified laws and regulations throughout our engagement team and remaining alert to any indications of non-compliance throughout our audit; and
- considering the risk of acts by the Authority which were contrary to applicable laws and regulations, including fraud.

Our audit procedures in relation to fraud included but were not limited to:

- making enquiries of management and the Authority on whether they had knowledge of any actual, suspected or alleged fraud;
- gaining an understanding of the internal controls established to mitigate risks related to fraud;
- discussing amongst the engagement team the risks of fraud; and
- addressing the risks of fraud through management override of controls by performing journal entry testing.

There are inherent limitations in the audit procedures described above and the primary responsibility for the prevention and detection of irregularities including fraud rests with management and the Authority. As with any audit, there remained a risk of non-detection of irregularities, as these may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal controls.

We are also required to conclude on whether the Chief Finance Officer's use of the going concern basis of accounting in the preparation of the financial statements is appropriate. We performed our work in accordance with Practice Note 10: Audit of financial statement and regularity of public sector bodies in the United Kingdom, and Supplementary Guidance Note 01, issued by the National Audit Office in April 2021.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Report on the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources

Matter on which we are required to report by exception

We are required to report to you if, in our opinion, we are not satisfied that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources for the year ended 31 March 2021.

We have not completed our work on the Authority's arrangements. On the basis of our work to date, having regard to the guidance issued by the Comptroller and Auditor General in April 2021, we have not identified any significant weaknesses in arrangements for the year ended 31 March 2021.

We will report the outcome of our work on the Authority's arrangements in our commentary on those arrangements within the Auditor's Annual Report. Our audit completion certificate will set out any matters which we are required to report by exception.

Responsibilities of the Authority

The Authority is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, to ensure proper stewardship and governance, and to review regularly the adequacy and effectiveness of these arrangements.

Auditor's responsibilities for the review of arrangements for securing economy, efficiency and effectiveness in the use of resources

We are required under section 20(1)(c) of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We are not required to consider, nor have we considered, whether all aspects of the Authority's arrangements for securing economy, efficiency and effectiveness in its use of resources are operating effectively.

We have undertaken our work in accordance with the Code of Audit Practice, having regard to the guidance issued by the Comptroller and Auditor General in April 2021.

Matters on which we are required to report by exception under the Code of Audit Practice

We are required by the Code of Audit Practice to report to you if:

- we issue a report in the public interest under section 24 of the Local Audit and Accountability Act 2014;
- we make a recommendation under section 24 of the Local Audit and Accountability Act 2014; or
- we exercise any other special powers of the auditor under sections 28, 29 or 31 of the Local Audit and Accountability Act 2014.

We have nothing to report in these respects.

Use of the audit report

This report is made solely to the members of Peak District National Park Authority, as a body, in accordance with part 5 of the Local Audit and Accountability Act 2014 and as set out in paragraph 44 of the Statement of Responsibilities of Auditors and Audited Bodies published by Public Sector Audit Appointments Limited. Our audit work has been undertaken so that we might state to the members of the Authority those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the members of the Authority, as a body, for our audit work, for this report, or for the opinions we have formed.

Delay in certification of completion of the audit

We cannot formally conclude the audit and issue an audit certificate until we have completed:

- the work necessary to issue our assurance statement in respect of the Authority's Whole of Government Accounts consolidation pack; and
- the work necessary to satisfy ourselves that the Authority has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

Mark Surridge, Key Audit Partner

For and on behalf of Mazars LLP, Birmingham UK

9 INTERNAL AUDIT REPORT BLOCK 1 2021/22 (JW)

1. Purpose of the report

This report presents to Members' the Internal Auditors' recommendations for the first block of the 2021/22 internal audit and the agreed actions for consideration. Ian Morton of Veritau our Internal Auditors will be available at the meeting to answer any questions relating to the audit report or process as usual.

Key Issues

- The Auditors give an opinion based on four grades of assurance (Substantial/Reasonable/Limited/No). Two of the three areas audited, IT Access Controls & User Awareness Audit, Risk Management and Main Accounting/ Capital Accounting, have been given a Substantial assurance whilst Risk Management has received a reasonable assurance.
- The priority of agreed actions is determined based on a scale of 1 – 3, with 1 representing a fundamental system weakness which needs urgent attention, 2 a significant weakness which needs attention, and 3 no significant weakness but merits attention. No areas for action were identified in the IT or Main Accounting audits and one level 2 and two level 3 actions have been responded to in the Risk Management audit.

2. Recommendations

1. **That the Internal Audit reports for the three areas covered under Block 1 for 2021/22 IT Access Controls & User Awareness, Main Accounting and Risk Management (in Appendices 1 to 3) be received and the agreed actions considered.**

How does this contribute to our policies and legal obligations?

3. As identified in the Annual Governance Statement, the Internal Audit process is regarded as an important part of the overall internal controls operated by the Authority and recommendations are addressed by the Authority's managers in the management response to the audit report.

Background Information

4. The Accounts and Audit Regulations 2015 require that the Authority maintains an adequate and effective system of internal audit of its accounting records and its system of internal control in accordance with proper practices in relation to internal control. The contract for the Internal Audit service is let to Veritau Ltd. The Internal Audit Plan for 2021/22 was approved by the Authority meeting in September 2021 (Minute No 61/21 refers).

Proposals

5. Managers have carefully considered the Internal Auditors' recommendations and the agreed actions are set out in the audit reports in Appendices 1 to 3 for Members' consideration.

Are there any corporate implications members should be concerned about?

- Financial:**
6. There are resource implications of implementing recommendations and this is why the priority rating of recommendations is important as this has to be managed within existing budgets and staffing levels, taking account of the level of risk agreed by management. The cost of the Internal Audit Service Level Agreement is found from within the overall Finance budget.

- Risk Management:**
7. The Internal Audit process is regarded as an important part of the overall internal controls operated by the Authority.

- Sustainability:**
8. There are no implications to identify

- Equality, Diversity and Inclusion:**
9. There are no implications to identify.

- Climate Change**
10. There are no implications to identify

- Background papers (not previously published)**
11. None

- Appendices**
12. Appendix 1 - Access Controls & User Awareness Audit 2021/22
Appendix 2 - Main Accounting Audit 2021/22
Appendix 3 - Risk Management Audit 2021/22

Report Author, Job Title and Publication Date

Justine Wells, Head of Finance, 27 January 2022



IT Access Controls and User Awareness
Peak District National Park Authority
Internal Audit Report 2021/22

Business Unit: Information and Performance Management
Responsible Officer: Head of Information and Performance Management
Service Manager: IT Manager
Date Issued: 7 January 2022
Status: Final
Reference: 69180/003

| | P1 | P2 | P3 |
|-----------------------|-----------------------|----|----|
| Actions | 0 | 0 | 0 |
| Overall Audit Opinion | Substantial Assurance | | |



Summary and Overall Conclusions

Introduction

Organisations such as the Peak District National Park Authority (PDNPA) are reliant on technology to store and access data. Therefore it is essential that there are comprehensive security measures in place that help ensure data, systems and assets are protected from damage, unauthorised access, loss and misuse.

The PDNPA utilise third party systems to support the authority's services. These systems are used for a number of purposes such as administering cycle hire and allowing residents to submit planning applications electronically. If the Authority do not have controls in place to maintain the security of customer data then they risk breaching GDPR regulations and suffering reputational damage. One important area of keeping applications secure is ensuring access to the systems is limited to authorised individuals only.

The most prolific method of distributing malicious software or allowing unauthorised individuals to gain access to an organisations network and data is via phishing emails. Phishing is where an attacker masquerades as a trusted entity to convince a victim into opening an email. Phishing attacks are becoming more sophisticated to get around email filters and appear like a genuine email. The National Cyber Security Centre highlights the importance of staff cyber security awareness training in reducing the likelihood and impact of a successful phishing attack.

Objectives and Scope of the Audit

The purpose of this audit was to provide assurance to management that procedures and controls within the system ensured that:

- Access controls were appropriately authorised and monitored in third party applications.
- Suitable training and guidance was provided to staff to raise cyber security awareness.

Key Findings

The Authority has appropriate access controls in place for its third party applications and access to these applications was appropriately authorised and monitored. We saw that there are clear processes for adding and removing users from third party applications. There is clear governance in place for managing applications and responsibility for adding and removing users had been delegated to a primary and secondary administrator for each application. System administrators monitor user access for the systems. In addition to this, the Web Manager carries out regular reviews on the management of applications which checks that monitoring is taking place. We reviewed the list of users with administrative or editorial access to applications and saw that access levels were linked to job roles and all seemed reasonable. There were also appropriate password requirements in place for each of the applications.

We found there were a number of measures in place to raise awareness of cyber security risks in the Authority. The Information Management Policies Framework covers acceptable usage of IT and instructs users on appropriate action to take if they have any cyber

security related concerns. One area of improvement that could be made to the policy is to add disciplinary actions if the policy has not been followed. ISO 27002 control objectives recommend that the information security policy should contain disciplinary procedures for instances where the policy is breached. This would act as a deterrent against breaching the policy and would also make it easier for the Authority to take appropriate action in the event of ICT misuse. We saw that the policy was up to date and had been reviewed regularly. Users are required to complete an online form to confirm they have read and understood the policy before being granted access to PDNPA systems.

The Authority have also rolled out a phishing email training exercise whereby staff were sent fabricated phishing emails and staff responses to receiving the emails were monitored. The Authority recorded whether staff opened, clicked, or opened and clicked on the emails. A total of 310 staff received between 2 and 6 fake phishing emails with 109 staff clicking on at least one email. Staff that clicked on one of these fake phishing emails were then directed towards training on phishing emails based on their response to the fabricated phishing emails, for example staff identified as 'repeat offenders' were given additional training. There is a review planned for January 2022 to ascertain which staff have training outstanding and to take action to remedy this. In addition to the phishing training, staff in the IT department have taken further training on Data Security via the ELMS system.

Communication of the cyber security risks facing the Authority is good. The quarterly Corporate Authority Performance Report includes KPIs for data security and there is also an Information Management Service risk register covering ransomware, hacks, DDoS, and internal threats.

Overall Conclusions

A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited. Our overall opinion of the controls within the system at the time of the audit was that they provided Substantial Assurance.

Audit Opinions and Priorities for Actions

Audit Opinions

Our work is based on using a variety of audit techniques to test the operation of systems. This may include sampling and data analysis of wider populations. It cannot guarantee the elimination of fraud or error. Our opinion relates only to the objectives set out in the audit scope and is based on risks related to those objectives that we identify at the time of the audit.

Our overall audit opinion is based on 4 grades of opinion, as set out below.

| Opinion | Assessment of internal control |
|-----------------------|--|
| Substantial Assurance | A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited. |
| Reasonable Assurance | There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited. |
| Limited Assurance | Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited. |
| No Assurance | Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited. |

Priorities for Actions

| | |
|------------|--|
| Priority 1 | A fundamental system weakness, which presents unacceptable risk to the system objectives and requires urgent attention by management. |
| Priority 2 | A significant system weakness, whose impact or frequency presents risks to the system objectives, which needs to be addressed by management. |
| Priority 3 | The system objectives are not exposed to significant risk, but the issue merits attention by management. |

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Main Accounting

Peak District National Park Authority

Internal Audit Report 2021/22

Business Unit: Finance
Responsible Officer: Head of Finance
Service Manager: Senior Finance officer
Date Issued: 12 January 2022
Status: Final
Reference: 69125/006

| | P1 | P2 | P3 |
|-----------------------|-----------------------|----|----|
| Actions | 0 | 0 | 0 |
| Overall Audit Opinion | Substantial Assurance | | |

Summary and Overall Conclusions

Introduction

The Peak District National Park Authority (PDNPA) use Exchequer as their main accounting system. Exchequer is a record of the general ledger and records all the financial activity of the PDNPA. It is used to prepare the annual accounts and various financial returns required by the Government.

Weekly bank reconciliations, accurate use of journals and appropriate use of suspense accounts are an important part of the financial internal control framework.

Details of fixed assets are maintained and accounted for, in accordance with established accountancy practice guidelines, to arrive at an accurate representation of the year-end position in the Authority's published accounts. The 2020/21 annual accounts are currently in draft stage and are expected to be finalised and approved by Members in November 2021.

Objectives and Scope of the Audit

The purpose of this audit was to provide assurance to management that procedures and controls within the system ensure that:

- Bank reconciliations are performed on a regular basis and authorised appropriately
- Suspense accounts are maintained accurately and cleared on a regular basis
- Journals are accurately recorded and are authorised correctly
- Accurate working papers are maintained and reviewed regularly to monitor capital expenditure

Key Findings

At PNDPA, the main control in relation to bank reconciliations is focused on the weekly bank reconciliations. Once these weekly bank reconciliations are carried out, each month they are compiled into a monthly sheet which is sent to the Head of Finance for authorisation. The bank reconciliations for June and August 2021 were reviewed and we found they had been fully reconciled in both instances. However it was noted that the June reconciliation sheet did not record the Head of Finance's electronic signature, although it has been received and authorised via email. It would be beneficial if authorisation was recorded consistently on the monthly sheet.

Suspense accounts are reviewed on an ad hoc basis during the year and cleared down at the year-end due to the small number of transactions which go through the accounts. At the time of the audit there was a current year balance of £1,353 in suspense. £1,270 of which related to a single transaction (an overpayment which had not been reclaimed). We reviewed evidence of the suspense accounts being cleared at the year-end and no concerns were raised.

A review of journals processed so far in the 2021/22 financial year was undertaken. It was found that all 7 members of finance staff have access to input a journal, there are no restrictions on codes users have access to, and there is no review of journals (nominal transfers). Through discussion with officers it was determined that miscodes would be identified as part of the monthly budget monitoring process, and that incorrect cost centre and department combinations would be identified from the weekly system report which is run.

We found journals had been processed appropriately and there were no concerns with the sample of journals reviewed as part of this audit. Our data analytics software, IDEA, was used to analyse journal entries and analysis confirmed that there were no duplicate journals. IDEA was also used to conduct a gap analysis and this identified 38 gaps of 111 journal numbers in the sequence. However 85 of these gaps related to journal adjustments for the prior financial year so were not included in the transaction report used to conduct the analysis. A further 19 of the missing references related to stock journals which were not appearing on the transaction report but were in the Exchequer system. The remaining 7 journal references could not be located in Exchequer by the Senior Finance Officer, however there is a known system error in Exchequer relating to the fast posting of journals, and the missing journal references relate to the date this error was identified.

Our analysis of journals highlighted 68 journals that did not initially appear to balance to zero. Further analysis identified that the VAT posting does not appear on the transaction report produced by the system, creating the appearance of an imbalance though all journals reviewed were balanced appropriately.

Virement procedure notes exist as part of the financial procedure rules and different authorisation is required depending on the value of the virement. We found that virements are not carried out frequently at the Authority and both virements processed in the current financial year had been appropriately authorised.

Accurate working papers are maintained and reviewed regularly to monitor capital expenditure. Capital spend is monitored throughout the year and presented to Members twice a year. The current asset management plan covers the years 2020-2024, it was approved by Members in February 2020 and is available on the Authority's website. The asset register is reviewed and updated as part of the year end closedown process. The register and the working paper for the 2020/21 year end were reviewed as part of this audit and no issues were found. However, external auditors identified some issues with assets historical data, and whilst the asset is included on the register, it is not clear when the asset was first acquired. The Head of Finance is aware of this issue and work is underway to amend the register.

The current Capital Strategy was approved in December 2015 covering the years 2015 to 2020, due to Covid and the uncertainty of funding the new strategy has been delayed. Work is underway on the revised strategy and it is due to be presented to Members at the February 2022 Authority meeting.

Overall Conclusions

A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited. Our overall opinion of the controls within the system at the time of the audit was that they provided Substantial Assurance.

Audit Opinions and Priorities for Actions

Audit Opinions

Our work is based on using a variety of audit techniques to test the operation of systems. This may include sampling and data analysis of wider populations. It cannot guarantee the elimination of fraud or error. Our opinion relates only to the objectives set out in the audit scope and is based on risks related to those objectives that we identify at the time of the audit.

Our overall audit opinion is based on 4 grades of opinion, as set out below.

| Opinion | Assessment of internal control |
|-----------------------|--|
| Substantial Assurance | A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited. |
| Reasonable Assurance | There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited. |
| Limited Assurance | Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited. |
| No Assurance | Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited. |

Priorities for Actions

| | |
|------------|--|
| Priority 1 | A fundamental system weakness, which presents unacceptable risk to the system objectives and requires urgent attention by management. |
| Priority 2 | A significant system weakness, whose impact or frequency presents risks to the system objectives, which needs to be addressed by management. |
| Priority 3 | The system objectives are not exposed to significant risk, but the issue merits attention by management. |

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Risk Management

Peak District National Park Authority

Internal Audit Report 2021/22

Responsible Officer: Head of Information and Performance Management
 Service Manager: Senior Strategy Officer – Research
 Date Issued: 18/01/2022
 Status: Final
 Reference: 69110/005

| | P1 | P2 | P3 |
|------------------------------|----------------------|----------|----------|
| Actions | 0 | 1 | 2 |
| Overall Audit Opinion | Reasonable Assurance | | |

Summary and Overall Conclusions

Introduction

Embedded and effective risk management are key to help deliver successful decision-making. Risk management is an essential component of good governance and has the potential to make a significant contribution to the achievement of strategic objectives. At the Peak District National Park Authority (PDNPA), risk management processes contributes to the fourth outcome in the corporate strategy: 'The PDNPA is an agile and efficient organisation'.

A Risk Management policy is in place to promote proactive management of exposure to risk and ensure mitigating actions are appropriately implemented to maintain and improve performance. The policy recognises that in pursuit of its vision and objectives, the Authority may choose to accept an increased degree of risk in certain circumstances. It will do so, subject always to ensuring that the potential benefits and risks are fully understood before developments are authorised, and that sensible measures to mitigate risk are established.

A corporate risk register is maintained at the Authority. The corporate register is agreed annually and updated every quarter. Updates are reported in full bi-annually to Senior Management and Members and exceptions are reported at the other two quarters. Service level risk registers are also updated quarterly and overseen by Heads of Service.

Objectives and Scope of the Audit

The purpose of this audit was to provide assurance to management that procedures and controls within the system ensure that:

- Appropriate governance arrangements are in place to oversee risk management.
- Effective processes are in place to identify, measure and assess risks.
- Comprehensive risk registers are in place and reviewed consistently.
- Actions to reduce and mitigate risks are clearly assigned to responsible officers and progress is monitored.

Key Findings

The risk management process at PDNPA has been recently updated and both Corporate and Service level risk registers are updated in full in Q2 and Q4. For Q1 and Q3, exception reporting is done via the Chief Executives update if any significant changes have occurred. Appropriate governance arrangements were found to be place to oversee all registers. The Corporate register was approved in Q4 2020/21 and we found it has been appropriately reported in line with established processes.

Service risk registers were also found to have been reviewed and updated appropriately. Heads of Service are responsible for updating their service risk register regularly and providing full updates every 6 months. Regular meetings are held to review identified risks and determine if significant risks should be included on the Corporate register.

The Authority has an up to date Risk Management Policy in place which includes the Authority's underlying approach to risk management, its risk appetite and roles and responsibilities. There is further guidance on scoring identified risks and guidance on defining likelihood and impact. The Corporate risk register as at Q1 2021/22 currently contains 15 strategic risks. There are 11 Service area risk registers also in place.

Identified risks are currently scored before mitigation and with mitigating actions in place on Corporate and service registers, but there is no target risk score for after planned actions have been implemented. On both the Corporate and Service risk registers, we identified risks that did not have a reduction between the inherent (pre control) and residual (post control) risk scores. On 3 of the Service registers, we also found risks that had a higher residual score allocated. This suggests the mitigating controls in place do not reduce or increase the likelihood of the risk occurring or the impact if it did occur. Risk scores should decrease with mitigating controls in place.

A 3 x 3 scoring matrix is currently used at the Authority to score risks based on their likelihood and impact. This is a relatively small risk matrix and best practice guidelines usually recommend use of a 5 x 5 risk matrix. The Authority should consider implementation of a 5 x 5 matrix as this would allow for more movement of risk scores to show the impact of mitigating controls and actions. The Corporate register includes the individual impact and likelihood score for each risk. However, this was not done consistently on Service risk registers and due to this, we were unable to determine in most instances if mitigating actions and controls and reduced Service level risk scores.

Risk registers should clearly highlight controls that are planned to further manage an identified risk. Each risk on both the Corporate and Service register has a 'quarterly update' to provide a summary of the risk's current position and these have been updated consistently. However, most mitigating actions did not have a specific timescale for implementation in place. 7 Corporate risks did not have a specific deadline for their corresponding action plans and most due dates were recorded as 'ongoing'.

A Corporate risk scored as red with target dates for agreed actions in place was reviewed. Our review of historic registers from 2020/21 found these due dates and actions have not changed since Q2 2020/21. Quarterly updates have been provided but this has not affected the mitigating actions or timescales. There are some risks on the corporate register scored as red or amber which would require further mitigation within a targeted deadline, in line with the Authority's scoring matrix. Due to the lack of deadlines for actions and numerical risk scoring, we were unable to determine if actions sufficiently mitigated risks and if they had been implemented appropriately.

Overall Conclusions

There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited. Our overall opinion of the controls within the system at the time of the audit was that they provided Reasonable Assurance.

1 Action monitoring

Issue/Control Weakness

Issues with the quality and appropriateness of action plans in place to mitigate risks. Actions are not routinely monitored and updated.

Risk

Ineffective monitoring of progress towards reducing or removing risks. Action plans do not effectively reduce or manage risks leading to risk events occurring.

Findings

Risk registers should clearly highlight controls that are planned to further manage identified risks to within risk appetite. At PDNPA, actions are in place for both Corporate and Service level risks. However, our review of action plans in place on all risk registers suggest recording and monitoring of mitigating actions could be improved.

Service risk registers and corresponding action plans highlighted inconsistent approaches to identifying actions. Some registers 'mitigating actions' appeared to be existing controls that are already in place rather than proposed actions to reduce risks. This included risks scored as red and amber where further management is required. Timescales for implementing actions was consistently recorded as 'ongoing' across numerous registers for amber or red risks that would require further reduction. In some Service areas, we saw examples of actions and timescales for implementation being recorded appropriately.

Similar issues were identified on the Corporate register and 7/12 Corporate risks did not have specific timescale in place for implementing agreed actions. The timescales for these actions were also recorded as 'ongoing' or 'periodic assessment'. For the 3 highest rated risks, all with a red score, only 1 had an action with a due date of Q1. The red rated risk with target dates in place for Q1-Q4, 'gross income targets', was reviewed. Our review of registers for 2020/21 show that these targets and due dates have not changed since Q2 2020/21. Quarterly updates were provided but do not appear to have changed the mitigating actions or timescales.

As the majority of the risks and corresponding action plans did not contain specific dates for actions to be completed, we were unable to confirm if actions have been completed appropriately though updates are provided in most instances in the 'quarterly updates section'. Risk reporting should clearly and accurately record when actions are due and when they are completed. Actions should be planned activities and tasks to be implemented in order to further mitigate the risk. When actions have not been completed, this should be clear with an explanation for the delay and a new due date provided. It is accepted that some risks cannot be mitigated to be within appetite, if the nature of the risk means uncertainty is expected but this should also be clearly recorded.

Agreed Action 1.1

Ensure that actions and timescales for implementation are recorded appropriately on both the corporate and service risk registers. More specifically, this is as follows;

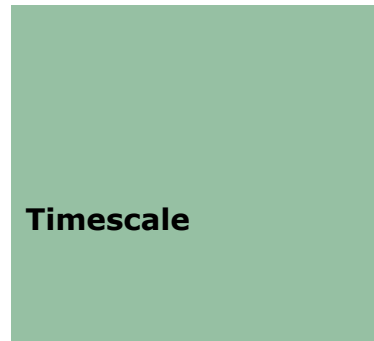
Priority

2

Responsible Officer

Head of
Information &

- Mitigating actions are not just existing controls, but are proposed actions to reduce risks (unless nothing further can be done to reduce the risk, in which case this will be clearly recorded as such).
- Timescales for implementing actions are not recorded as 'ongoing', but are time specific.
- Mitigating actions and timescales are consistently updated at quarterly updates.
- We record when actions have been completed and, where actions have not been completed, that we make this clear alongside an explanation, a new timescale and any further actions required.



Performance
Management

31 March 2023

2 Risk Measurement

Issue/Control Weakness

Risks appear to have been scored inappropriately on the Corporate and Service risk registers. Due to the current format of the risk matrix, we were unable to determine if risks had been mitigated appropriately.

Risk

A lack of consistent procedures and understanding of risk management across the Authority may lead to risks being managed ineffectively.

Findings

Corporate and Service risk registers are in place at PDNPA and updated on a quarterly basis. Identified risks are currently scored twice on both these registers; before mitigation and with mitigating actions in place. Our review of the Q4 2020/21 registers identified areas for improvement in the risk analysis and evaluation process that suggest understanding of risk scoring could be improved.

The risk matrix currently used at the Authority does not have numerical scores allocated to each score, but scores likelihood and impact as High Medium or Low. All risks on the Corporate register and some risks on Service registers do include the individual likelihood and impact scores. This makes it clear which cell a risk falls into on the risk matrix. However, some risks on service registers only include the overall risk score. Green and amber both cover 4 cells within the risk matrix and due to this we were unable to determine in the majority of instances if the mitigating actions had reduced the risk score on Service risk registers. For example a risk may be an amber (manage and monitor) risk that has been managed to an amber (management effort worthwhile) risk after mitigation, but this is not clear from the service risk register as the 2 scores appear only as amber.

A 3 x 3 scoring matrix is currently used at the Authority to score the likelihood of risks occurring and their impact if they do occur. As this is a relatively small matrix, it may be challenging to mitigate the risk enough to lower the risk score category. It may be beneficial for the Authority to use a 5 x 5 matrix, which is commonly used in best practice guidelines. This would make the impact of mitigating controls and actions clearer on the overall risk score as reductions in likelihood and impact would be more evident.

The Corporate risk register contained 5 risks with no reduction between the inherent (pre control) and residual (post control) risk scores. Similar issues were found in the Service registers, 2 of which were found to have risks with a red 'high' score allocated for both the inherent and residual scores. A further 3 registers contained risks whose scores have increased between the inherent and residual scores. This scoring suggests the mitigating controls in place do not have any significant effect on the likelihood of the risk occurring and/or the impact if it did occur. Risk scores should decrease with mitigating controls in place, so this suggests either the scoring is incorrect or highlights the issues with a 3 x 3 Matrix.

On 7 of the service risk registers, green risks were recorded. As above due to the lack of numerical scores, we were unable to determine if these had been reduced significantly and were 'accepted' or if they were accepted but still required monitoring as stipulated on the risk matrix.

Agreed Action 2.1

Ensure that assessment of likelihood and impact are clearly recorded on both the corporate and service risk registers so that any reduction in risk before and post mitigation are visible. At the moment, the risk rating is written in the column 'risk before mitigation' and then shown as a colour in 'risk rating with mitigating action'. We will change the latter column so the likelihood and impact are written in the same format as the 'risk rating before mitigation', so it provides more detail than just the colour.

| | |
|----------------------------|--|
| Priority | 3 |
| Responsible Officer | Head of Information & Performance Management |
| Timescale | 31 March 2023 |

3 Best practice elements

Issue/Control Weakness

Elements recommended by best practice guidelines from the Institute of Risk Management (IRM) are not currently included in the Authority's risk management process.

Risk

Processes are not in line with best practice guidance. Ineffective procedures may lead to risks being managed unsuccessfully.

Findings

The IRM recommends a number of best practice elements to be included in risk management processes to promote efficient and effective practices. At PDNPA, a Risk Management Policy is in place and is up to date, having last been updated in May 2021. The policy contains the majority of recommended best practice areas, however there are two key elements not currently used at the Authority that would further improve arrangements.

Best practice recommends 3 scores to be considered and allocated for each risk; inherent, residual and target. The target risk score is not currently allocated in the PDNPA risk analysis process. The target score represents the score that will be allocated once mitigating action plans have been successfully implemented. Target risk scores highlight to Management and Members how actions will reduce the risk to within appetite or conversely, if all reasonable actions have been taken the target score will show that the risk has been tolerated.

Guidelines are in place to promote consistent scoring of risks based on their likelihood and impact and a 3 x 3 scoring matrix is in place. Each box on the risk matrix represents the combination of the likelihood of the risk occurring and the impact, and it is common for each box to be assigned a numerical value. However, numerical values are not assigned on the PDNPA risk matrix which relies on the use of high, medium or low scores currently. As highlighted, we saw Service level risks with two 'amber' scores and were unable to determine if these had been reduced or remained the same as they did not include individual impact and likelihood scores. Though the risk matrix is sufficient, allocating these numbers may provide clarity when scoring and monitoring identified risks, as highlighted in Finding 2.

In addition, the Authority may consider implementation of a 5 x 5 matrix to develop risk scoring and clearly show the effect of mitigating actions. It is possible identified risks could be significantly reduced once mitigating actions have been implemented, but this would not be reflected in the risk score due to the relatively small matrix. Significant effort, which may not be possible or cost effective, may currently be needed to move the risks score on the current matrix.

The format of the register could also be revised to improve clarity. The current layout may not facilitate effective scoring, as the pre control score is recorded after the existing controls. A more effective format would be to use the order inherent score, existing controls, residual score, planned controls/actions, target score.

Agreed Action 3.1

We will assess the impact of action 2.1 before reviewing the risk matrix further either by way of any changes to score risk or change to a 5 x 5 matrix. Due to the nature of risks that the Authority has, we will initially assess the reduction in risk from the risk rating before mitigation and after additional mitigating actions are taken account of.

| | |
|----------------------------|--|
| Priority | 3 |
| Responsible Officer | Head of Information & Performance Management |
| Timescale | 31 March 2023 |

Audit Opinions and Priorities for Actions

Audit Opinions

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|-----------------------|--|
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| Limited Assurance | Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited. |
| No Assurance | Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited. |

Priorities for Actions

| | |
|------------|--|
| Priority 1 | A fundamental system weakness, which presents unacceptable risk to the system objectives and requires urgent attention by management. |
| Priority 2 | A significant system weakness, whose impact or frequency presents risks to the system objectives, which needs to be addressed by management. |
| Priority 3 | The system objectives are not exposed to significant risk, but the issue merits attention by management. |

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10. A57 LINK ROADS SCHEME (TN)

1. Purpose of the report

To inform Members about the progress of the National Highways A57 Link Roads Scheme; to inform Members about the Local Impact Report submitted by the Authority in response to the scheme and to seek a decision from Members on the Authority's current Holding Objection to the scheme.

Key Issues

- The proposed A57 Link Roads scheme lies wholly outside of the Peak District National Park boundary. The primary aim of the scheme is to relieve congestion and the effects of road traffic on the residents of Mottram and Woolley Bridge
- In its opening year, delivery of the scheme is predicted to substantially increase traffic flows on the A628 Trunk Road and the A57 Snake Pass within the National Park; it also leads to increased traffic flows on the A6024 Holme Moss road and Monk's Road. The scheme leads to a small reduction in traffic flows on the B6015 Woodhead Rd and the A624 Glossop to Little Hayfield road.
- The scheme is predicted to significantly increase traffic flows through Tintwistle.
- The effects of the scheme on the National Park are primarily 'indirect effects' resulting from the increased traffic flows on National Park roads. Where these adverse effects have been assessed within the Environmental Statement they have been described as slight and scoped out.
- The increase in traffic flows along the A628 corridor do not meet the threshold for full assessment under the guidance, so the effects have been scoped out.
- The Peak District National Park Authority has submitted two holding objections to the proposed scheme, which are still extant.

2. Recommendations

- 1. That Members endorse the submitted Local Impact Report at Appendix 1.**
- 2. That Members support officer attendance at the Hearing Meetings.**
- 3. That Members formalise the current holding objection to a full objection on the basis of the unacceptable impacts of the scheme on the Special Qualities of the National Park.**

How does this contribute to our policies and legal obligations?

3. National Planning Policy Framework (2021)

Paragraph 176 of the National Planning Policy Framework (2021) sets great weight on "conserving and enhancing landscape and scenic beauty in National Parks", going on to state: -

"The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

Paragraph 177 goes on to make a presumption against major development in National

Parks, and goes on to clarify that: -

“whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

Whilst, in this instance, the National Park Authority is not the decision maker, we do have a role to play in assessing impact on the Peak District National Park and its special qualities.

Peak District National Park Core Strategy (2011)

The Peak District National Park Core Strategy (2011) sets out the strategic planning policies for the whole area of the National Park. Chapter 7 sets out the General Spatial Policies for the National Park. GSP 1: Securing national park purposes and sustainable development sets out the following approach: -

“Policy GSP1 seeks that any development proposal will comply with core policies so that any development in the National Park must satisfy the statutory purposes of national park designation.”

Chapter 9: Landscapes and conservation sets out the Authority’s strategic policies for landscape. Part A of Policy L1: Landscape character and valued characteristics states: -

“Development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan, and other valued characteristics.”

Where development is proposed outside of the National Park, but with a negative effect on the National Park, Policy L1A is considered in developing a response to that proposed development.

Chapter 15: Accessibility, travel and traffic sets out the Authority’s position in relation to the delivery of new road schemes either within or affecting the National Park. Core Strategy Policy T1: Reducing the general need to travel and encouraging sustainable transport sets out a high-level ambition for transport within the National Park. Of particular relevance are parts B, C and E of the policy: -

- B. Cross-Park traffic will be deterred.
- C. Modal shift to sustainable transport will be encouraged.
- E. Impacts of traffic within environmentally sensitive locations will be minimised.

Core Strategy Policy T2: Reducing and directing traffic provides the Authority’s strategic approach to road-building within the National Park, with parts A, B and C being of particular relevance: -

- A. Transport developments, including traffic management schemes, which reduce the amount of cross-Park traffic, will be supported if they can be accommodated without adverse impact on the National Park’s valued characteristics. Transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment will be opposed.
- B. 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;

- C. 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.

Peak District National Park Development Management Policies (2019)

The Peak District National Park Development Management Policies (2019)¹ document provides detailed policies that underpin the Core Strategy. Chapter 9: Travel and transport includes two policies dealing with road building within the National Park.

Development Management Policy DMT1: Cross park roads offers clarity to Core Strategy Policy T2 by providing the criteria by which transport developments that increase cross-Park traffic might be acceptable. The policy states: -

New roads for cross-Park travel will not be supported, and proposals for a major alteration to an existing road will not be permitted, unless:

- (i) there is a compelling national need which cannot be met by any reasonable alternative means; and
- (ii) it is demonstrated to be in the overall public interest; and
- (iii) it is demonstrated to provide long term local transport benefit; and
- (iv) there is a demonstrable long-term net environmental benefit within the National Park; and
- (v) there is a demonstrable long-term net economic benefit for the National Park.

Background Information

4. The Scheme

The proposed National Highways A57 Link Roads scheme is the latest to be proposed to address longstanding issues of congestion in and around the Longdendale villages of Mottram and Tintwistle.

A previously proposed scheme for a bypass of Mottram, Hollingworth and Tintwistle was brought forward in 2003, resulting in a Public Inquiry in 2007. The scheme included road building within the National Park and was forecast to significantly increase traffic flows across the A628. The Peak District National Park Authority formally objected to the scheme on the grounds of its impact on the National Park. The scheme was formerly withdrawn by Highways England in 2009 following a long delay to the Inquiry related to errors in traffic modelling.

In September 2015, the Department for Transport commissioned a study aimed at identifying options for future investment on Trans-Pennine routes to improve connectivity between Manchester and Sheffield. Along with longer-term consideration for whole route options, an assessment was made in relation to the congestion issues of the Longdendale villages. The favoured option was for two relief road schemes to divert

¹ [Webpage-Final-Branded-DMP-Doc-Copy.pdf \(peakdistrict.gov.uk\)](#)

traffic from the existing A57(T) at Mottram Moor and from the A57 at Woolley Bridge.

In the development of the scheme, Highways England identified the following key transport objective: -

“environmental – avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities”²

At this stage, the scheme was referred to as the Trans Pennine Upgrade Programme and included two eastbound climbing lanes within the National Park boundary, upgrades to the Westwood Roundabout and safety and technology measures across the route. The climbing lanes were subsequently removed from the programme. The Highways England Trans Pennine Upgrade Programme underwent a statutory public consultation in February to March 2018. The National Park Authority submitted a holding objection approved by the Authority on the basis of there being insufficient information upon which to assess the scheme’s impact on the National Park.

Following the public consultation, Highways England paused the scheme and a decision was taken to deliver the Westwood Roundabout and safety and technology measures separately and in advance of the relief roads.

Following some amendments to the scheme, Highways England undertook a further public consultation in November and December 2020. The Peak District National Park Authority submitted a further holding objection on the basis of there being insufficient information upon which to assess the scheme’s impact on the National Park. Owing to the timing of the consultations and the Authority calendar, this holding objection was submitted with the agreement of the Director of Conservation & Planning and the Chair and Vice Chair of the Authority.

Highways England submitted the Development Consent Application to Highways England in the summer of 2021. An Examining Authority was appointed and the Examination formerly opened on 17th November 2021. The Examining Authority has been given a six-month timescale for the Examination, which is due to end in May 2022.

The Peak District National Park Authority was formally invited to produce a Local Impact Report on 19th November with a deadline of Friday 14th January 2022. The Local Impact Report was submitted on Friday 14th January 2022 and forms Appendix 1 to this report. The initial issue specific hearings of the Examination are scheduled for the week commencing 7th February 2022.

The Campaign for the Protection of Rural England has submitted an alternative solution to the A57 Link Roads Scheme as part of its representation to the Planning Inspectorate. The web-links to the appropriate documents on the Planning Inspectorate website have been circulated to Members for information.

Predicted effects of the scheme

Traffic flows

The A57 Link Roads Scheme Peak District National Park Local Impact Report focusses on the effects of the proposed scheme on the National Park. These effects are largely due to changes in traffic flows as a result of the scheme. These effects are considered to be indirect because they are not directly related to the actual scheme. However,

² A57 Link Roads TR010034 6.3 Environmental Statement Chapters 1-4, Paragraph 2.2.1
Chapters 1-4 Introductory Chapters

because of the national and international importance of the Peak District, its special qualities and its ecological designations, great weight should be given to these effects.

The traffic modelling for the scheme provides a comparison of traffic flows without the scheme (Do Minimum), with traffic flows with the scheme (Do Something) for the opening year (2025) and the Design Year (2040). Appendix 2 shows the effect of the scheme on traffic flows on Peak District roads for both timeframes (the figures are for Annual Average Daily Traffic (AADT)).

A628(T)

With the scheme, the A628(T) is predicted to see a daily increase in traffic of between 850 and 950 vehicles across the Peak District in 2025 compared to without the scheme. The figures vary depending on the section of the road, with the highest increase of 950 (+9%) vehicles being the westernmost section from the junction with the B605. The other sections see a 7% increase in flows, with the central section between the B605 and A624 junctions seeing a daily total of 14,000 vehicles with the scheme in 2025. The proportion of HGV traffic varies between 13 and 14%, with a slight decrease in numbers of HGVs along the eastern section of the route.

By the design year (2040), the daily traffic totals with the scheme are between 900 and 1,100 higher than without the scheme. Again, the highest increase of 1,100 vehicles is on the western section and equates to a 10% increase compared to without the scheme. The other sections see a 7% increase in flows, with the central section between the B605 and A624 junctions seeing a daily total of 15,650 vehicles with the scheme in 2040. The proportion of HGV traffic remains constant between the two scenarios varies between 11 and 13%, with an increase in numbers of 108 to 153 HGVs per day over the 'Do Minimum' scenario.

A57 Snake Pass

With the scheme, the A57 Snake Pass is predicted to see a daily increase in traffic of approximately 1,150 (+38%) vehicles across the Peak District in 2025 compared to without the scheme. The predicted overall daily total of HGVs remains low (42), but this represents a 36% increase in their number compared to without the scheme.

By the design year (2040), the daily traffic totals with the scheme are 1,450 higher than without the scheme; again a 38% increase. The predicted overall daily total of HGVs remains low (53), but this represents a 36% increase in their number compared to without the scheme.

A624 Glossop to Little Hayfield

With the scheme, the A624 Glossop to Little Hayfield road is predicted to see a daily decrease in traffic of 100 vehicles (-1%) vehicles across the Peak District in 2025 compared to without the scheme. The proportion of HGV traffic is however predicted to increase from 3% to 4%; equating to an increase in numbers of 92 HGVs per day (a 32% increase in the total number per day).

By the design year (2040), the daily traffic totals with the scheme are 600 lower than without the scheme; a 5% decrease. The proportion of HGV traffic is however predicted to increase from 3% to 4%; equating to an increase in numbers of 100 HGVs per day (a 27% increase in the total number per day).

A6024 Holme Moss

With the scheme, the A6024 Holme Moss road is predicted to see a daily increase in traffic of 100 vehicles (+14%) vehicles across the Peak District in 2025 compared to without the scheme. The traffic model indicates that no HGV traffic will use this route.

By the design year (2040), the daily traffic totals with the scheme are 50 higher than without the scheme; a 6% increase. The traffic model indicates that no HGV traffic will use this route.

B6015 Woodhead Road

With the scheme, the B6015 Woodhead road is predicted to see a daily decrease in traffic of 50 vehicles (-2%) vehicles across the Peak District in 2025 compared to without the scheme. The proportion of HGV traffic is predicted to remain constant at 5%. This equates to a decrease in numbers of -2 (a -2% decrease) per day.

By the design year (2040), the daily traffic totals with the scheme are 200 lower than without the scheme; a 6% decrease. The proportion of HGV traffic is predicted to decrease from 5% to 4%; equating to a decrease in numbers of 45 HGVs per day (a 25% decrease in the total number per day).

Monks' Road

Monks' Road was not included in the modelled data submitted as part of the DCO application. However, Officers of the National Park Authority sought clarity on the effects of the scheme on the route. The data provided by National Highways in response only provided the relative change in vehicle totals with the scheme compared with the 'Do Minimum' scenario. Those figures are: -

- 2025 – there is an increase in the AADT of +241 vehicles per day
- 2040 – there is an increase in the AADT of +654 vehicles per day

It is unclear what percentage increase is represented by this growth or the proportion of HGV traffic.

Effects of the traffic flow increase on the special qualities of the National Park

It should be noted that generally, National Highways and their agents consider the effects of the scheme on the National Park to be slight and with one exception (road safety) not to require mitigation.

Whilst the changes in traffic flow appear to be quite large for National Park roads, only the predicted change in flows for A57 Snake Pass road in the opening year has been high enough (+1,000 vehicles per day) to warrant additional assessments as part of the road network affected by the scheme.

In the case of the two roads most affected by changes in traffic flows, the increase in traffic on the A628(T) is only 50 vehicles below this threshold and the road already carries high number of vehicles including a high proportion of HGVs. In this respect, in all likelihood the road is already having a significant negative effect on the special qualities of the National Park and any increase in traffic will worsen this effect.

For the A57 Snake Pass, the existing traffic flows are quite low and the scheme will result in a dramatic increase in flows, albeit to lower levels than on other roads. This sudden and dramatic change is likely to have an equally sudden and dramatic effect on the special qualities of the National Park adjacent to the road.

It should be noted that of the six National Park roads listed above, four see increase in

traffic flows as a result of the scheme and two see decreases. However, on balance the scheme represents a predicted overall increase in traffic flows on National Park roads.

Air Quality

Tintwistle is currently subject to an Air Quality Management Area (AQMA) within the National Park. The AQMA was declared by High Peak Borough Council in Tintwistle in 2018 due to exceedances of the annual mean total for nitrous oxides resulting from traffic flow through the village.

This AQMA is still extant, and whilst it is likely that nitrous oxide emissions will improve over time as the overall vehicle fleet changes, the increase in flows through the AQMA are of some concern.

Nitrous oxide emissions are also associated with nitrate enrichment of soil in bands alongside road corridors. Notwithstanding, the anticipated greening of the vehicle fleet, nitrate deposition poses a risk to the nutrient poor soils associated with the SAC / SPA designated habitats and species.

Cultural Heritage

The increase in traffic through Tintwistle is likely to affect perceptions of the Tintwistle Conservation Area, whilst airborne pollution and traffic vibration may have negative effects on the fabric of buildings adjacent to the A628(T).

Increased traffic flows are also likely to affect people's perceptual experience of cultural heritage adjacent to the A628 and A57 Snake Pass.

Landscape and visual

Officers are concerned with how the indirect landscape impacts (increased traffic flow) of the scheme have been assessed. National Policy sets great store in ensuring the road schemes and their effects are thoroughly assessed to avoid or minimise impacts on National Parks. We do not believe that appropriate landscape receptors have been adequately defined at the correct level of detail to determine indirect landscape effects of the scheme (on character and perceptual aspects such as tranquillity, wildness, remoteness etc) within the National Park.

We are also concerned that where negative impacts have been recognised, 'slight adverse' effects are not considered to be material. In the case of a protected landscape we believe that slight adverse effects are a material consideration. We also believe that indirect visual effects are under-assessed. This is particularly pertinent due to the cumulative harm caused by additional traffic loads on top of the existing high levels of traffic through these valleys.

Biodiversity

Officers are concerned that increases in air pollution, notably Nitrogen deposition, and the impact of this on Blanket Bog and Upland Heathland habitats within the South Pennine Moors SAC. We note that this potential impact has been scoped out in the Habitats Regulations Assessment as having no likely significant effects on the basis that the predicted traffic increases are below the threshold of 1000 AADT; however, some of the figures are very close to the 1000 AADT figure and we would question what the confidence limits are for those figures. Should the confidence limits mean that the figures could exceed the 1000 AADT threshold, and notwithstanding the predicted improvements in quality of vehicle emissions, then we would suggest that the potential

Nitrogen deposition impact should be factored in as a potential impact warranting further consideration as part of an Appropriate Assessment.

Officers are concerned about the increases in visual and noise disturbance to breeding moorland birds; both the SPA-qualifying species (Short-eared Owl, Merlin, Golden Plover) and the wider range of birds for which the Dark Peak SSSI qualifies, such as Curlew, Snipe and Dunlin. There may also be similar impacts on Mountain Hare- a species of Principal Importance in England and for which the Peak District population is the sole English population. These potential disturbance effects have been scoped out of further consideration on the basis that the roads are already busy. However, no evidence appears to be presented to substantiate that conclusion.

There is research evidence to suggest that both visual and noise disturbance can impact negatively on breeding birds, with some studies suggesting that there may be thresholds of tolerance by different species. No evidence appears to be presented to consider what disturbance thresholds might be relevant to the species concerned; whether the existing levels of disturbance already exceed those tolerances; or whether the predicted traffic increases might push the disturbance levels above key tolerance thresholds. This is particularly the case for the A57 where significant traffic increases of 38% are predicted.

Officers are also concerned about the increase in fire risk associated with higher traffic flows. This has not been scoped into potential factors having a significant effect; however, between 2007-2016 there were 260 recorded wildfires on the Peak District moors. Only 28 of these had causes attributed, of which 1 was specifically attributable to a vehicle and a further 6-7 attributable to discarded cigarettes, a proportion of which may arise from vehicles on roads traversing the moors. So, it is likely that at least 1 wildfire per year on the Peak District moors is attributable to vehicle use. Any increase in traffic volumes; particularly as large as the 38% predicted increase on the A57, is likely to increase the risk of wildfire. We would therefore suggest that the assessment of increased wildfire risk has wrongly been scoped out of having a potential significant impact on Blanket Bog and Upland Heathland habitat in the SAC.

Noise and vibration

The A628 carries large numbers of vehicles through Tintwistle. The traffic modelling indicates that with the scheme in 2025, there will be 11,650 vehicles passing through Tintwistle (950 vehicles more than in the 'Do Minimum' scenario). HGVs make up 14% of this total (1,631).

This high level of traffic and the percentage of HGVs will have a negative effect on residents of the village of Tintwistle. This will be particularly acute for those properties adjacent to the road and where vehicles are climbing eastwards out of the village. The pedestrians and equestrian crossings within the village, necessary to allow crossing of the A628 exacerbate the situation as motor vehicles are generally noisier in low gears and accelerating; this is particularly the case for diesel engine HGVs.

The quiet enjoyment of the National Park is already affected by existing traffic levels. For users of the high moorland stretch of the Longdendale / Trans Pennine Trail; the noise of traffic on the A628 approaching Longside is audible before the road itself is visible.

Similarly, whilst the A628 is separated from users of the lower section of the Trans Pennine Trail by the width of the valley and the Longdendale valley reservoirs, the road

is still audible; albeit as a distant rumble.

Visitors to the high gritstone edges that parallel the A57 Snake Pass are reminded of the presence of an often not visible road by the sound of traffic. This is particularly the case at weekends when high-revving motorcycle engines often obscure the sounds of birdsong, the breeze or the trickle of water in the cloughs.

Given the existing levels of noise disturbance for visitors to the National Park as described above, it is likely that this nuisance will become worse. For users of the Trans Pennine / Longdendale Trail adjacent to the A628, traffic noise is already a fairly constant intrusion. The addition of between 850 and 950 additional vehicles per day (2025 Do Something') is likely to reduce the number or length of quieter periods.

For the A57 Snake Pass, the increase in vehicles is more pronounced (1,150 or 38%) with the scheme (2025). It is likely that this will have a more noticeable effect for visitors to the National Park.

Severance

There is an extensive rights of way network across the Dark Peak Area of the Peak District National Park. In addition to footpaths and bridleways, the area is crossed by a number of nationally important routes – the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. These routes cross both the A628 Trunk Roads and the A57 Snake Pass within the National Park. The principle crossing points are: -

- The A628 Trunk Road
 - The Pennine Bridleway crossing point at the eastern edge of Tintwistle
 - The Pennine Way crossing at Torside
 - The Longdendale / Trans Pennine Trail crossings at Woodhead Station, Longside End and Carr Bottom
- The A57 Snake Pass
 - The Pennine Way crossing at Snake Summit

These and other crossing points on the A628 and A57 in particular can already be difficult to use due to existing levels of traffic. Users of these routes are also exposed to traffic noise, dust and vehicle fumes when using, or waiting to use these crossing points.

Both the A628(T) and A57 Snake Pass are predicted to see increased traffic flows as a result of the scheme compared with the 'Do Minimum Scenario'. For those crossing these roads, the increase in traffic flows will make these crossings even more difficult. Table 8.2 shows the predicted traffic flows at each of the crossing points described above both with and without the scheme.

The issue of severance will also be made more severe in the village of Tintwistle as a result of the scheme.

Road safety

The schemes Transport Assessment acknowledges the current high accident rate on

the A57 Snake Pass. It goes on to state that the increase in traffic flows as a result of the scheme is likely to increase the number of accidents by: -

“more than 160 over the 60-year appraisal period, as a result of increased flows in the DS scenario.”³

The Transport Assessment goes on to state that: -

“Small increases in accidents are also expected through Glossop and along the rural sections of the A628 east of Tintwistle.”

Climate

The Environmental Statement contains detailed consideration of the physical effects of climate change on the planned road structure that appear robust and thorough. However, consideration of the schemes contribution to climate change is not analysed with an equivalent rigour.

Officers believe that a more local assessment of impact should be undertaken to consider the emissions in relation to those who are likely to benefit from the scheme and the immediate area where its impact will be felt, would be more appropriate.

Cumulative impacts

Officers are particularly concerned about the cumulative impacts of the scheme on the following: -

- a) **Tintwistle** – increased traffic flows through the village are likely to worsen air quality and noise & vibration; increase severance and effect experience of the Conservation Area.
- b) **Designated sites** – increased traffic flows are likely to increase nitrate deposition, noise disturbance, risk of wildfire and collisions with wildlife. It is of particular concern that the effects of the increase in traffic on the A628 have not been assessed in relation to these impacts.
- c) **Quiet enjoyment** – increased traffic flow will affect both tranquillity and the quiet enjoyment of the landscape. It is also likely to negatively affect the use of important multi-user routes due to the increased difficulty of using crossing points.

Proposals

Officers of the Authority have been engaged in discussions with Transport for the North, Highways England (National Highways) and the Department for Transport in regard to a holistic approach to improving east-west connectivity across the Southern Pennines including across the National Park. Over time these discussions included a proposal for a complete Trans-Pennine Tunnel; and then a part-Tunnel. At the current time, it is unclear how this holistic approach might be taken forward. It is therefore important that any assessment of the A57 Link Roads scheme is based wholly on its own merits as a scheme addressing localised issues for the Longdendale villages.

National Policy clearly sets great weight on the conservation and enhancement of the landscape and scenic beauty of National Parks; along with their cultural heritage and wildlife. The A57 Link Roads scheme is located wholly outside of the boundary of the

³ A57 Link Roads TR010034 7.4 Transport Assessment Report

Peak District National Park and so the development itself does not directly impact on the National Park.

The A57 Link Roads scheme is however predicted to significantly increase traffic flows within the National Park. This does go against the policy approach provided within our Core Strategy (Policy T1B) which seeks to deter cross-Park traffic. This policy approach is based on the anticipated harm of increased traffic flows on the special qualities of the National Park. The predicted increase in traffic flows along the A57 Snake Pass and the predicted transfer of traffic from the M62 to the A628(T) are particularly at odds with this approach.

The increased traffic flows across the National Park that are predicted as a result of the scheme do clearly incur indirect impacts on the National Park. In all cases, where they have been assessed, they are judged by National Highways to be, at worst, slight adverse (except in the case of road safety). However, it is the opinion of officers, that the even slight adverse impacts should be given due weight within the National Park. This is because of the additional impact this represents from existing levels and the national importance of the Park's special qualities; and the international importance of its ecological designated sites.

In particular, the cumulative impacts of the predicted increase in traffic flows across a range of special qualities is of particular concern. Given the range of predicted impacts, officers believe that the only appropriate response is to formerly object to the proposed scheme.

Are there any corporate implications members should be concerned about?

Financial:

5. None

Risk Management:

6. Objecting to the A57 Link Roads scheme will be seen in a negative light by residents of Mottram and Woolley Bridge most affected by the scheme.

Support for the scheme or a withdrawal of our holding objection may be seen to be being accepting of harm to the special qualities of the National Park. Residents of Tintwistle may also believe that the Authority is not acting in their best interests.

Sustainability:

7. None

Equality, Diversity and Inclusion:

8. None

9. Climate Change

The delivery of the scheme is likely to increase carbon emissions within the National Park in the medium term due to the predicted increase in traffic flows.

10. Background papers (not previously published)

None

11. Appendices

Appendix 1 - A57 Link Roads Scheme Peak District National Park Local Impact Report

Appendix 2 - PREDICTED CHANGES IN TRAFFIC FLOWS AS A RESULT OF THE
A57 LINK ROADS SCHEME

Report Author, Job Title and Publication Date

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A57 Link Roads Scheme

Peak District National Park

Local Impact Report

**Produced by the Peak District National Park
Authority (January 2022)**

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1. Introduction to the Report and Terms of Reference

- 1.1 This Local Impact Report has been prepared by the Peak District National Park Authority and forms part of the National Park Authority's response to the National Highways A57 Link Roads scheme.
- 1.2 The Planning Act (2008) sets out the process for dealing with proposals for Nationally Significant Infrastructure Projects (NSIPs). This process includes the examination of major proposals, including those for transport. The examination offers opportunities for individuals and organisations to comment on the proposals prior to a decision being taken by the relevant Secretary of State.
- 1.3 As part of the examination process, appropriate local authorities are invited to produce a Local Impact Report. This report should contain an assessment of the impact of the proposed scheme on the local authority's area.
- 1.4 The scheme under discussion within this report is the National Highways A57 Link Roads scheme. This scheme focusses on the delivery of two relief roads providing bypasses of congested areas in the east of Tameside Metropolitan Borough. Both of these proposed link roads fall outside of the boundary of the Peak District National Park.
- 1.5 Because the proposed schemes fall outside the boundary of the National Park, the focus of this Local Impact Report is on the wider effects of the scheme, beyond the Development Consent Order boundary; and within the Peak District National Park.
- 1.6 English and Welsh National Park Authorities have specific statutory duties in relation to the designation of 'National Park' and the land contained within each National Park. For the purposes of this Local Impact Report, the focus will be on the effects of the proposed schemes on the following topic areas within the National Park; Air Quality, Climate Change, Cultural Heritage, Ecology, Landscape, Noise; and the environment for walkers, cyclists and horse riders.
- 1.7 It should be noted that in some cases, particularly sensitive areas of the National Park may be affected by more than one type of impact. In such cases, we will also be providing comment on the cumulative effects of these impacts on those sites.

2. Executive Summary

Context

The Peak District National Park was the first National Park to be designated in the United Kingdom, in April 1951. The Peak District National Park lies at the heart of England and covers parts of the East Midlands, North West, West Midlands and Yorkshire & Humber regions.

The Peak District National Park Authority is not a highway or transport authority, but it is the planning authority for the whole of the National Park, regardless of other local authority boundaries.

The Peak District National Park Authority has two statutory purposes, these are “*the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park*” and “*the promotion of opportunities for the understanding and enjoyment of the special qualities of the National Park*”. Other public bodies have a statutory duty to have regard to these purposes when carrying out work that affects land within the National Park.

The Peak District National Park is one of the most popular visitor locations nationally, attracting between 13 and 26 million visits per annum. Lying at the heart of England, the Peak District National Park owes its popularity to the large urban populations that surround it, including the Greater Manchester and South Yorkshire conurbations.

The A57 Link Roads scheme falls wholly outside the Peak District National Park boundary. At its closest point the scheme lies approximately 2km from the edge of the National Park.

Policy Context

There has been a long-standing presumption against major development in National Parks including for trunk roads and motorways. The National Planning Policy Framework places great weight on the conservation and enhancement of the landscape and scenic beauty of National Parks.

Local Growth and Development

The Peak District National Park was designated for its landscape, cultural heritage and wildlife. As such, development is generally limited and focussed on the achievement of national park purposes and our statutory duty to foster the economic and social well-being of local communities within the National Park.

Existing local area characteristics

Tintwistle is a settlement located on the western edge of the Peak District National Park. The village is divided east and west by the National Park boundary, with the eastern half of the village falling inside the National Park. The A628 Trunk road passes through the village of Tintwistle. High Peak Borough Council to declare an Air Quality Management Area (AQMA) in Tintwistle in 2018. The AQMA was declared in relation to exceedances of the annual mean for Nitrous oxides (NOx). The Tintwistle AQMA is located inside the Peak District National Park.

Roads that are potentially affected by changes in traffic flow as a result of the proposed A57 Link Roads Scheme pass through two Conservation Area; Tintwistle (A628) and Little Hayfield (A624). In addition to these Conservation Areas, Peak District roads such

as the A628(T), A57 Snake Pass, A54 and Monks' Road pass in close proximity to a number of listed buildings and Scheduled Ancient Monuments.

The A57 Link Roads scheme is adjacent to that part of the National Park known as the Dark Peak. Much of the area of the Dark Peak is uncultivated land, with little signs of development; this is known as the Natural Zone. Generally, there is a presumption against development within the Natural Zone.

Much of the Dark Peak area of the Peak District National Park is subject to additional ecological designations. These are the South Pennine Moors SAC, Peak District Moors SPA, the Dark Peak SSSI and the Eastern Peak District Moors SSSI.

The National Park has acted as a tranquil refuge for more than 70 years. A sense of tranquillity delivers both physical and mental health and well-being benefits.

There is an extensive rights of way network across the Dark Peak Area of the Peak District. In addition to footpaths and bridleways, the area is crossed by a number of nationally important routes – the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. These routes cross both the A628 Trunk Roads and the A57 Snake Pass within the National Park.

The Peak District National Park is crossed by a number of rural roads that are subject to the climate and geography of the Peak District. This means that many of the roads rise from valley bottoms with twists and turns that follow rivers before crossing are over high and exposed ground. Many of these high-level routes are closed on a regular basis due to snow, winds or flooding. These severe weather events appear to becoming more frequent; it is likely that with the ongoing effects of climate change, such events may be more frequent and / or more severe in the future. The Peak District National Park contains some roads that have frequently been assessed as high risk by Road Safety Foundation European Road Assessment Programme (EuroRAP).

Excluding point sources, by far the largest CO² within the Peak District National Park emissions come from road transport.

Peak District Roads potentially affected by the scheme

The scheme leads to a general increase in traffic across four Peak District roads; the A628(T), the A57 Snake Pass, the A6024 Holme Moss and Monks' Road, when compared to the 'Do Minimum' scenario (in both 2025 and 2040). There is a decrease in flows on two Peak District roads; the B6015 Woodhead Road and the A624 Glossop to Chapel Milton Road, when compared to the 'Do Minimum' scenario (in both 2025 and 2040).

Local Impacts

The Peak District National Park is located to the east of the proposed scheme. As such, none of the proposed works have a direct impact on the National Park. However, the Environmental Statement accompanying the DCO submission for the scheme raises concerns for the Authority with regard to the indirect effects of the scheme on the National Park. In all cases, these effects are related to increased traffic flows on National Park roads, principally the A628 Woodhead and A57 Snake Passes.

The A628 Woodhead route across the National Park is predicted to experience a daily increase in traffic of up to 950 vehicles (2025) and 1,100 vehicles (2040); whilst the A57 Snake Pass will see an increase in vehicles of 1,150 (2025) and 1,450 (2040).

This growth in traffic has the potential to negatively affect the Special Qualities of the Peak District, whilst impacting on the achievement of the Statutory Purposes of the National Park (Section 61, Environment Act, 1995).

In the village on Tintwistle the negative effects of the scheme include on the Tintwistle Air Quality Management Area, the noise of traffic, severance for vulnerable road users and the effect on the Tintwistle Conservation Area.

In the wider National Park our concerns are focussed on the effects of the following

- Nitrate deposition on ecologically designated sites as a result of increased nitrous oxide emissions;
- Traffic noise impact on the quiet enjoyment of the National Park and its tranquillity;
- Severance of rights of way due to increased traffic flows, including on the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail;
- Road safety, the scheme is predicted to increase the number of accidents on the A628(T) and the A57 Snake Pass;
- Increased carbon emissions as a result of the scheme.

3. Context

3.1 Background information on the Peak District National Park

- 3.1.1 The Peak District National Park was the first National Park to be designated in the United Kingdom, in April 1951. The Peak District National Park lies at the heart of England and covers parts of the East Midlands, North West, West Midlands and Yorkshire & Humber regions.
- 3.1.2 This complex political geography means that the National Park has seven constituent highway authorities¹ (see Figure 3.1) and six constituent transport authorities². The Peak District National Park also falls within part of nine local authority areas³ (see Figure 3.2). The National Park is also split roughly north and south between two sub-National transport bodies; Transport for the North and Midlands Connect.
- 3.1.3 The Peak District National Park Authority is not a highway or transport authority, but it is the planning authority for the whole of the National Park, regardless of other local authority boundaries.
- 3.1.4 The Peak District National Park was designated under the National Parks and Access to the Countryside Act (1949). National Park Authorities were established under the Environment Act (1995). The National Parks and Access to the Countryside Act (1949) set out the statutory purposes for National Parks. These were restated in Section 61 of the Environment Act (1995). These purposes are: -
- i. The conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park, and
 - ii. The promotion of opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- 3.1.5 Section 62 of the Environment Act (1995) also sets out specific statutory duties for National Park Authorities and other bodies. For National Park Authorities, the duty is to: -

“Seek to foster the economic and social well-being of local communities within the National Park”⁴.

For other specified bodies, the duty is: -

To have regard to National Park purposes when exercising or performing any functions in relation to, or so as to affect, land in a National Park.

¹ Barnsley Metropolitan Borough Council, Cheshire East Council, Derbyshire County Council, Kirklees Council, Oldham Council, Sheffield City Council and Staffordshire County Council.

² Cheshire East Council, Derbyshire County Council, South Yorkshire Mayoral Combined Authority, Staffordshire County Council, Transport for Greater Manchester and West Yorkshire Combined Authority.

³ Barnsley Metropolitan Borough Council, Cheshire East Council, Derbyshire Dales District Council, High Peak Borough Council, Kirklees Council, North East Derbyshire District Council, Oldham Council, Sheffield City Council and Staffordshire Moorlands District Council.

⁴ Section 62, Environment Act (1995), [Environment Act 1995 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1995/24/section/62)

Figure 3.1 – The constituent highway authorities with responsibility in the Peak District National Park

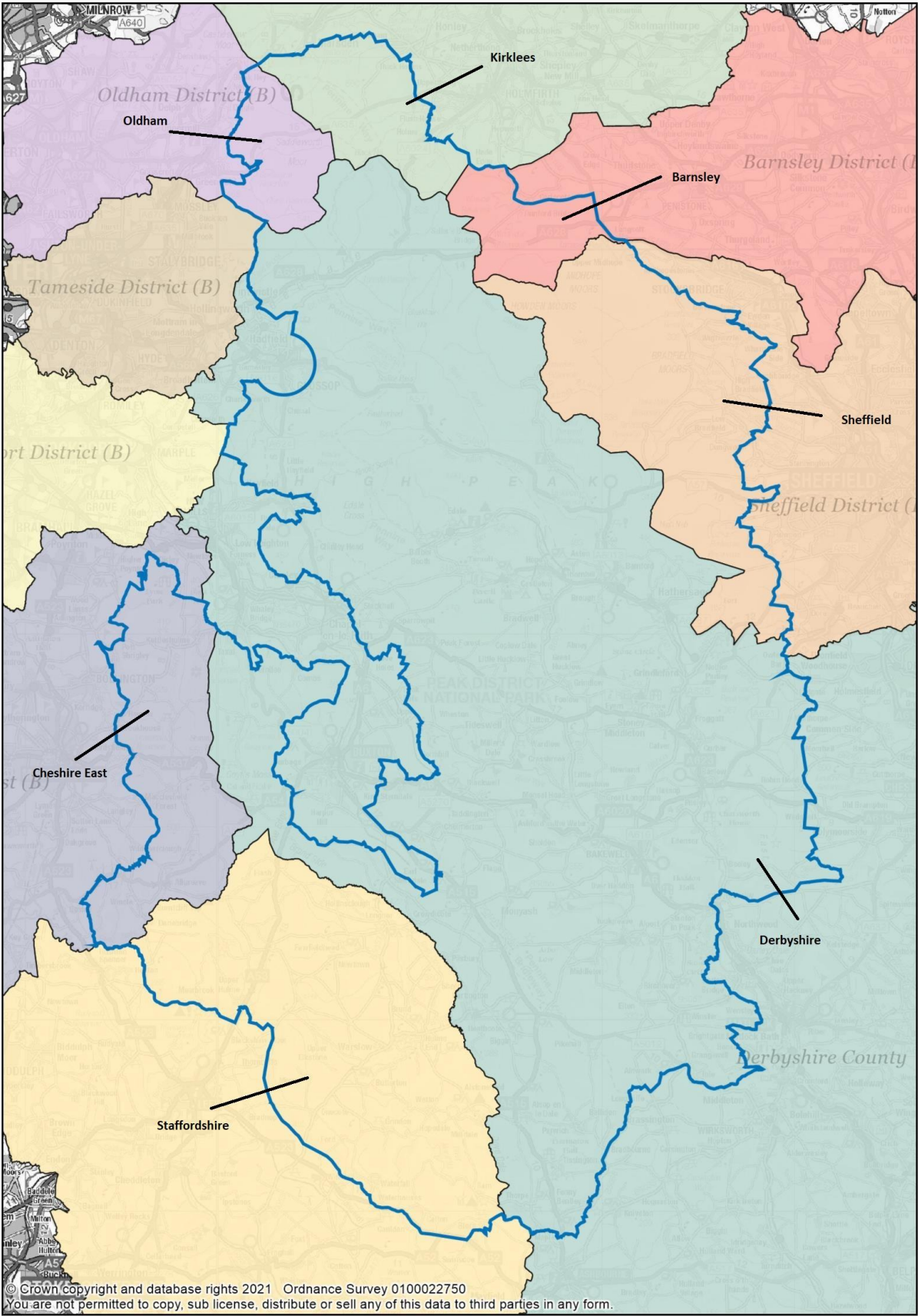
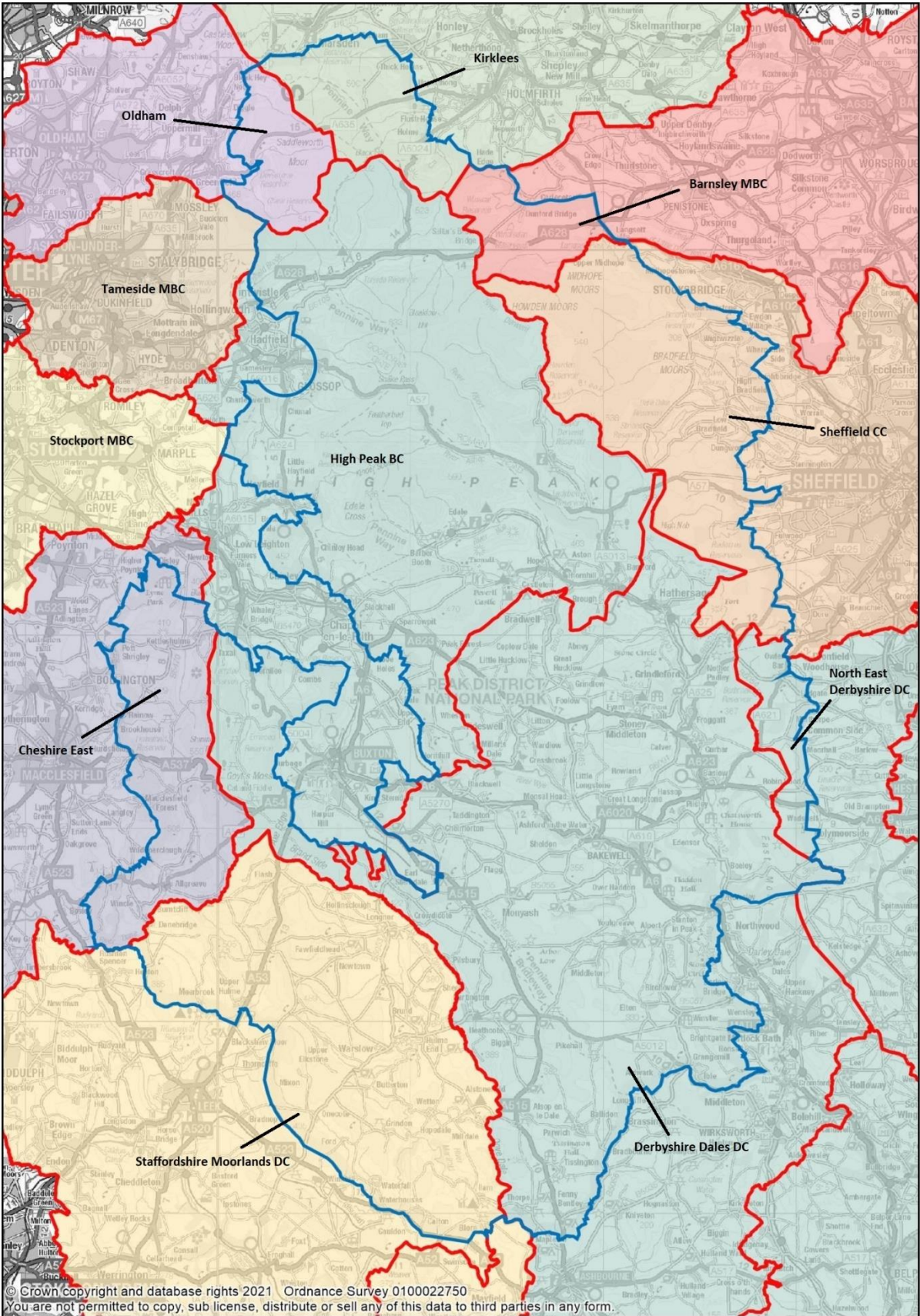


Figure 3.2 – The additional constituent and neighbouring local authorities of the Peak District National Park



This duty applies to a range of public bodies; in the context of this Local Impact Report, the section 62 duty applies to National Highways and any agents acting on their behalf.

- 3.1.6 The Peak District National Park is one of the most popular visitor locations nationally, attracting between 13 and 26 million visits per annum. Lying at the heart of England, the Peak District National Park owes its popularity to the large urban populations that surround it, including the Greater Manchester and South Yorkshire conurbations. According to the Census (2011), the Peak District National Park lies within a one-hour drive of approximately 16 million people.
- 3.1.7 This ease of access by car means that the majority of visits to the National Park are car-borne. Surveys undertaken by the National Park Authority indicate that 83% of visitors arrive by private car. However, for some popular recreation hubs, with limited alternative means of access, survey data suggests that this percentage is higher.
- 3.1.8 In addition to its National Park designation large parts of the Peak District are also subject to high level international ecological designations, including Special Area of Conservation (SAC) and Special Protection Area (SPA). In the Peak District, these two types of protection relate to the protection of rare species (particularly ground nesting birds) and their habitats. In many cases within the Peak District an area is subject to both SAC and SPA designation. In some cases, the locations are also designated as Sites of Special Scientific Interest (SSSI). Natural England is responsible for the protection of SSSI, SAC and SPA sites.

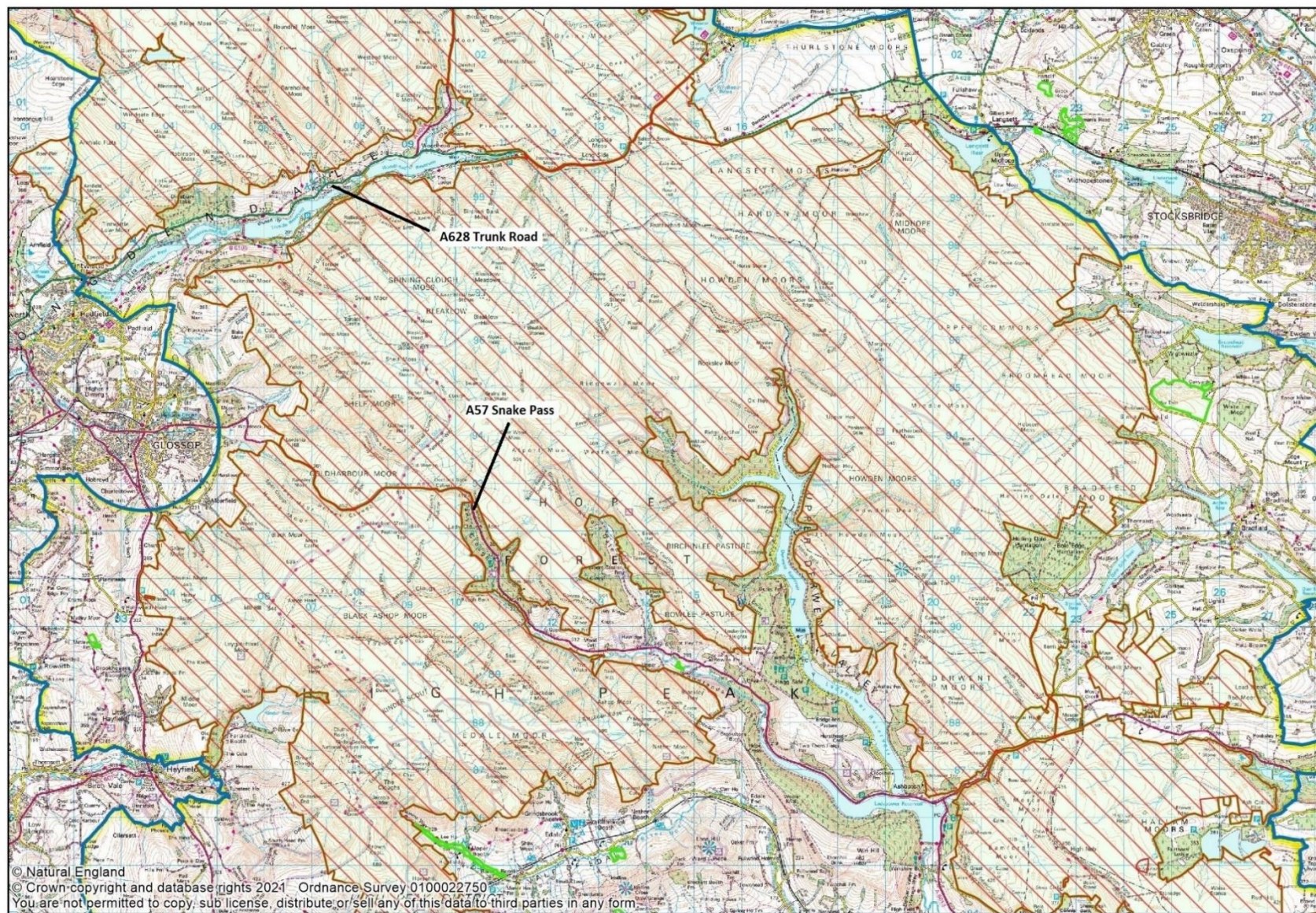
3.2 The relationship between the A57 Link Roads scheme and the Peak District National Park

- 3.2.1 As stated in paragraph 1.5, the A57 Link Roads scheme falls wholly outside the Peak District National Park boundary. At its closest point the scheme lies approximately 2km from the edge of the National Park.
- 3.2.2 The scheme comprises of two links roads that principally act to ease congestion on the existing A57 Trunk Road at Mottram Moor (the Mottram Moor Link Road) and the A57 at Woolley Bridge (the A57 Link Road). Whilst the scheme lies outside of the National Park, both of the proposed link roads connect into existing cross-Park routes.
- 3.2.3 The National Highways managed trunk road route continues from the eastern edge of the proposed Mottram Moor Link Road via the A628(T). The route passes through Hollingworth and enters via the National Park in Tintwistle. The A628(T) then climbs over the Woodhead Pass before descending to the Flouch Roundabout on the eastern edge of the National Park (see Figure 3.3).
- 3.2.4 In crossing the National Park, the A628(T) passes through moorland areas with the following ecological designations; South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI (see Figure 3.4). The road is bounded on both sides by these designations for approximately 5km between Woodhead Station in the west and Fiddlers Green in the east. Beyond Fiddlers Green, the southern edge of the A628 is bounded by the designations for approximately 1.5km towards Bord Hill.

Figure 3.3 – The A628 Trunk Road and A57 in the context of the National Park



Figure 3.4 – The A628 Trunk Road and A57 in the context of the SAC / SPA / SSSI designations



- 3.2.5 In addition to the ecological designations, the A628(T) features a number of crossing points for major walking and cycling routes. These include: -
- The Pennine Bridleway crossing point at the eastern edge of Tintwistle
 - The Pennine Way crossing at Torside
 - The Longdendale / Trans Pennine Trail crossings at Woodhead Station, Longside End and Carr Bottom
- 3.2.6 From Flouch, the Trunk Road joins the A616 running alongside the boundary of the National Park for approximately 1.6km to Langsett, before continuing on eastwards towards the Westwood roundabout.
- 3.2.7 The proposed A57 Link Road will connect to the existing A57 at the border between Tameside and Derbyshire. Travelling eastwards, the A57 continues through Glossopdale to Glossop. From Glossop the route crosses the boundary into the National Park below Shire Hill. The road then climbs the Snake Pass over the Snake summit before descending towards the Ladybower Reservoir.
- 3.2.8 From Ladybower, the A57 climbs eastwards over Moscar before descending along the Rivellin Valley and leaving the National Park at the junction with the A6101 Rivellin Valley Road. Beyond the National Park boundary, the A57 continues to Sheffield.
- 3.2.9 In crossing the Peak District National Park, the A57 passes through two distinct areas of moorland designated as SSSI, SAC and SPA. In the west, it passes through the South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI. The A57 is bounded by these designations on both sides for approximately 5.5km between Wash Brow in the west and Lady Clough in the east.
- 3.2.10 To the east of Ladybower, the A57 passes through the Peak District Moors SAC and the Eastern Peak District Moors SSSI. The road is loosely bounded on both sides for approximately 3km by these designations between the Ladybower Inn in the west and Moscar Lodge in the east. Beyond Moscar Lodge, the southern edge of the road is bounded by these designations for approximately 0.6km eastwards to Moscar Plantation.
- 3.2.11 In addition to the ecological designations, the A57 is crossed by the Pennine Way at the Snake Summit, along with a number of other footpaths and bridleways.

4. Policy Context

4.1 The National Policy Context

4.1.1 The Peak District National Park was designated under the National Parks and Access to the Countryside Act (1949). National Park Authorities were established under the Environment Act (1995). The National Parks and Access to the Countryside Act (1949) set out the statutory purposes for National Parks. These were restated in Section 61 of the Environment Act (1995). These purposes are: -

- i. The conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park, and
- ii. The promotion of opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

4.1.2 Both purposes carry equal weight except where there may be conflict between them. In such cases, National Park Authorities are directed to give greater weight to the first purpose over the second. This is known as the Sandford principle which is named after Lord Sandford who chaired the National Parks Policy Review Committee which reviewed national parks of England and Wales in between 1971 and 1974.

4.1.3 Section 62 of the Environment Act (1995) also sets out specific statutory duties for National Park Authorities and other bodies. For National Park Authorities, the duty is to: -

“Seek to foster the economic and social well-being of local communities within the National Park”⁵.

For other specified bodies, the duty is: -

To have regard to National Park purposes when exercising or performing any functions in relation to, or so as to affect, land in a National Park.

This duty applies to a range of public bodies; in the context of this Local Impact Report, the section 62 duty applies to National Highways and any agents acting on their behalf. This section also indicates that the relevant bodies also have to abide by the Sandford principle.

4.1.4 The Department for the Environment Circular 4/76 – Report of the National Parks Review Committee (1976) sets out the principle that the development of strategic roads should avoid National Parks, stating: -

“It is now the policy of Government that investment in trunk roads should be directed to developing routes for long distance traffic which avoid National Parks; and that no new road for long distance traffic should be constructed through a National Park, or existing road upgraded, unless it has been demonstrated that there is a compelling need which would not be met by any reasonable alternative means.”

⁵ Section 62, Environment Act (1995), [Environment Act 1995 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1995/42/section/62)

- 4.1.5 The Department of the Environment Circular 125/77 – Roads and traffic – National Parks (1977) adds further clarity, stating: -

“Where there is a compelling need for some solution to be found to the problem of increased through traffic, or to problems of road safety, in a National Park, a determined search should be made for alternatives which do not involve upgrading the existing route or new construction”

- 4.1.6 The English National Parks and the Broads: UK government vision and circular was published by Defra in 2010. The circular provided updated guidance on the matter of road building within National Parks; paragraph 85 states: -

“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.”⁶

- 4.1.7 Paragraph 176 of the National Planning Policy Framework (2021)⁷ states that

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

4.2 The Local Policy Context

- 4.2.1 The Peak District National Park Core Strategy (2011)⁸ sets out the strategic planning policies for the whole area of the National Park. Chapter 7 sets out the General Spatial Policies for the National Park. GSP 1: Securing national park purposes and sustainable development sets out the following approach: -

“Policy GSP1 seeks that any development proposal will comply with core policies so that any development in the National Park must satisfy the statutory purposes of national park designation.”

- 4.2.2 Chapter 9: Landscapes and conservation sets out the Authority’s strategic policies for landscape. Part A of Policy L1: Landscape character and valued characteristics states: -

“Development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan, and other valued characteristics.”

⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

⁷ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)

⁸ [Local Development Framework Core Strategy - Final Errata 2 \(30/11/11\) \(peakdistrict.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)

Where development is proposed outside of the National Park, but with a negative effect on the National Park, Policy L1A is considered in developing a response to that proposed development.

4.2.3 Chapter 15: Accessibility, travel and traffic sets out the Authority's position in relation to the delivery of new road schemes either within or effecting the National Park.

4.2.4 Core Strategy Policy T1: Reducing the general need to travel and encouraging sustainable transport sets out a high-level ambition for transport within the National Park. Of particular relevance are parts B, C and E of the policy: -

B. Cross-Park traffic will be deterred.

C. Modal shift to sustainable transport will be encouraged.

E. Impacts of traffic within environmentally sensitive locations will be minimised.

4.2.5 Core Strategy Policy T2: Reducing and directing traffic provides the Authority's strategic approach to road-building within the National Park, with parts A, B and C being of particular relevance: -

A. Transport developments, including traffic management schemes, which reduce the amount of cross-Park traffic, will be supported if they can be accommodated without adverse impact on the National Park's valued characteristics. Transport developments which increase the amount of cross-Park traffic or have other adverse effects on its setting and character, amenity and enjoyment will be opposed.

B. 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;

C. 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.

4.2.6 The Peak District National Park Development Management Policies (2019)⁹ document provides detailed policies that underpin the Core Strategy. Chapter 9: Travel and transport includes two policies dealing with road building within the National Park.

4.2.7 Development Management Policy DMT1: Cross park roads offers clarity to Core Strategy Policy T2 by providing the criteria by which transport developments that increase cross-Park traffic might be acceptable. The policy states: -

New roads for cross-Park travel will not be supported, and proposals for a major alteration to an existing road will not be permitted, unless:

- (i) there is a compelling national need which cannot be met by any reasonable alternative means; and

⁹ [Webpage-Final-Branded-DMP-Doc-Copy.pdf \(peakdistrict.gov.uk\)](#)

- (ii) it is demonstrated to be in the overall public interest; and
- (iii) it is demonstrated to provide long term local transport benefit; and
- (iv) there is a demonstrable long-term net environmental benefit within the National Park; and
- (v) there is a demonstrable long-term net economic benefit for the National Park.

4.3 Assessment of scheme against policy

- 4.3.1 The proposed scheme lies wholly outside the boundary of the Peak District National Park. However, because the scheme is predicted to have indirect impacts on national park purposes through increased traffic flows, Section 62 of the Environment Act (1995) is applicable.
- 4.3.2 Paragraph 176 of the National Planning Policy Framework (2021) makes it clear that development within the setting of the National Park should be “*sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*”
- 4.3.3 The stated Environmental Objectives of the scheme include measures to address the effects of traffic in residential areas, particularly those relating to noise and air quality. The following statement is also included: -
- “The Scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park.”*
- 4.3.4 As originally proposed, the A57 Link Roads scheme (formerly the Trans Pennine Upgrade Programme) included the delivery of two sections of climbing lanes along the A628(T) between Tintwistle and Flouch roundabout, within the National Park. This led to early, regular and ongoing engagement between Highways England / National Highways and the Peak District National Park Authority in relation to the scheme.
- 4.3.5 The Peak District National Park Core Strategy Policy T1: Reducing the general need to travel and encouraging sustainable transport sets out a strategic approach to transport within the National Park. The aim of the policy is to “*deter traffic beyond that which is necessary for the needs of local residents, businesses and visitors.*”
- 4.3.7 There is a predicted increase in traffic flows on cross Park roads (principally the A628 Woodhead Pass and the A57 Snake Pass) as a result of the proposed A57 Link Roads scheme. This would appear to be in conflict with Core Strategy Policy T1(B) which advocates deterring cross Park traffic. Core Strategy Policy T1(E) focuses on minimising the impacts of traffic on environmentally sensitive locations. Again, given the designations adjacent to these link roads and the predicted traffic growth, the scheme appears to be in conflict with Core Strategy Policy T1(E).
- 4.3.7 Core Strategy Policy T2: Reducing and directing traffic includes specific policy in relation to road schemes. There is a general presumption against transport schemes that either increase traffic or have other negative impacts on the National Park (Part A). However, the policy allows for exceptional circumstances where such schemes might be deemed acceptable (Part B). Part C of the policy makes it clear that the where schemes fall outside the Authority’s direct control, the same principles

described above would apply to the way in which they would be viewed by the Authority.

4.3.8 The Development Management Plan Policy DMT2: Cross park roads sets out the criteria that the Authority believes constitutes the exceptional circumstances under which a scheme that increases traffic and has other negative effects on the National Park would be acceptable to the Authority. From the Development Consent Order submission documents accompanying the scheme, it does not appear to meet all of these criteria; in particular the following parts: -

- (iii) it is demonstrated to provide long term local transport benefit; and
- (iv) there is a demonstrable long-term net environmental benefit within the National Park; and
- (vi) there is a demonstrable long-term net economic benefit for the National Park.

5. Local Growth and Development

- 5.1 The Peak District National Park was designated for its landscape, cultural heritage and wildlife. As such, development is generally limited and focussed on the achievement of national park purposes and our statutory duty to foster the economic and social well-being of local communities within the National Park.
- 5.2 This means that housing development is limited to the provision of dwellings to fulfil local need or open market housing leading to enhancement of exiting brownfield sites. The Peak District National Park Authority does not have any specific housing targets and does not allocate land for development. However, under normal circumstances approximately sixty new dwellings are approved per annum across the whole of the National Park. These contribute to the housing targets of the constituent planning authorities within the National Park.
- 5.3 With the exception of Tintwistle¹⁰, the area of the Peak District National Park that lies closest to the A57 Link Roads scheme is sparsely populated and is classified as the 'natural zone'. There is a general presumption against development within the natural zone. The additional internationally important ecological designations (South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI) also serve to limit the opportunities for development likely to generate additional traffic.
- 5.4 The area of the National Park that is closest to the A57 Link Roads scheme falls within High Peak borough. The responsibility for planning lies with High Peak Borough Council beyond the National Park boundary. Development is proposed and land allocated within the High Peak borough settlements outside the National Park boundary. The close proximity to Greater Manchester is a driver for housing development.

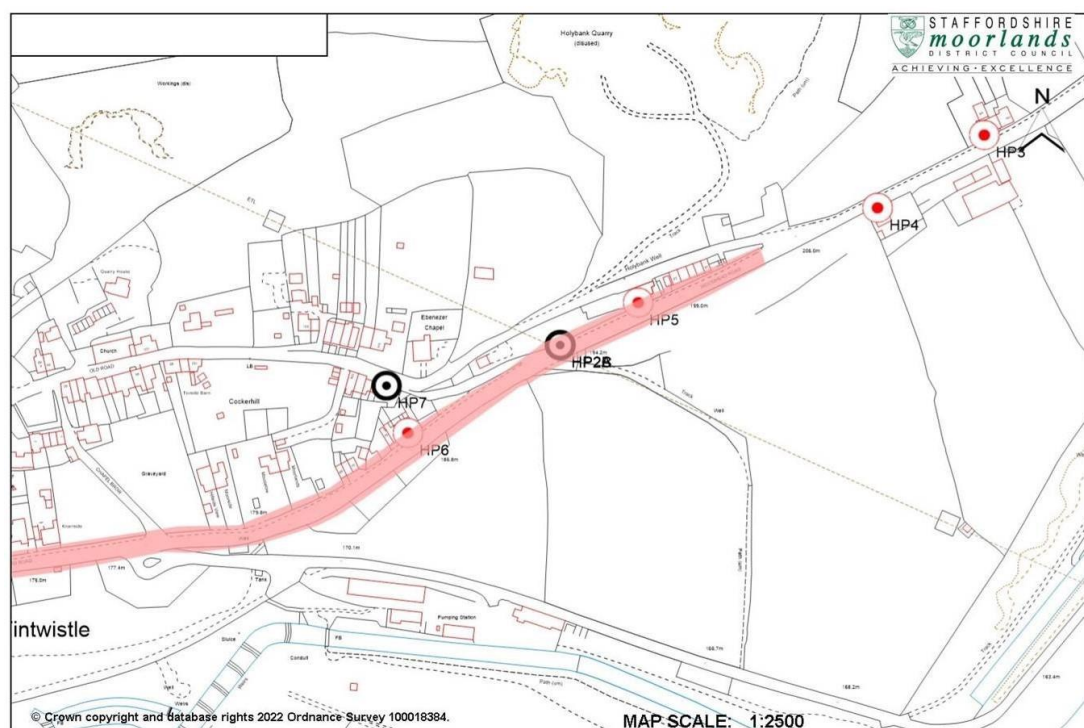
¹⁰ Tintwistle is the most easterly of the Longdendale villages; the National Park boundary follows the edges of Armfield Road, Bank Row and Bank Lane, effectively dividing the village in two, with the western part of the village falling inside the National Park.

6. Existing local area characteristics

6.1 Air Quality

- 6.1.1 This section focusses on the effects of air-borne pollutants associated with road transport. The area of the National Park most closely associated with the A57 Link Roads scheme falls within High Peak borough. High Peak Borough Council is the environmental health authority for that part of the National Park that falls inside the borough. This includes responsibility for air quality monitoring and management.
- 6.1.2 Tintwistle is a settlement located on the western edge of the Peak District National Park. The village is divided east and west by the National Park boundary, with the eastern half of the village falling inside the National Park. The A628 Trunk road passes through the village of Tintwistle.
- 6.1.3 As the A628 Trunk Road passes through the village of Tintwistle it climbs quite steeply from the centre of the village eastwards. The gradient acts to slow vehicles, particularly heavy goods vehicles resulting in increased exhaust emissions. The presence of Pegasus crossing for the Pennine bridleway on the east of the village may lead to more stopping and starting of climbing vehicles.
- 6.1.4 The effect of these vehicular emissions caused High Peak Borough Council to declare an Air Quality Management Area (AQMA) in Tintwistle in 2018. The AQMA was declared in relation to exceedances of the annual mean for Nitrous oxides (NO_x). The Tintwistle AQMA is located inside the Peak District National Park. High Peak Borough Council has installed a set of monitoring sites to record nitrous oxide levels in and around the Tintwistle AQMA. Figure 6.1 shows the locations of these monitoring sites.

Figure 6.1 – High Peak Borough Council nitrous oxide monitoring sites in Tintwistle¹¹



¹¹ Figure 6.1 supplied courtesy of High Peak Borough Council

- 6.1.5 Two of the NO_x monitoring sites have shown regular exceedances of annual mean figure of 40 µg/m³. It is this exceedance that led to the declaration of an AQMA. The sites where exceedances were recorded are HP2a and HP5. Table 6.1 shows the annual mean totals for the two sites. Prior to the Covid-19 pandemic, both remained in exceedance but were showing a downward trend. Further detail can be seen in Table 6.1.

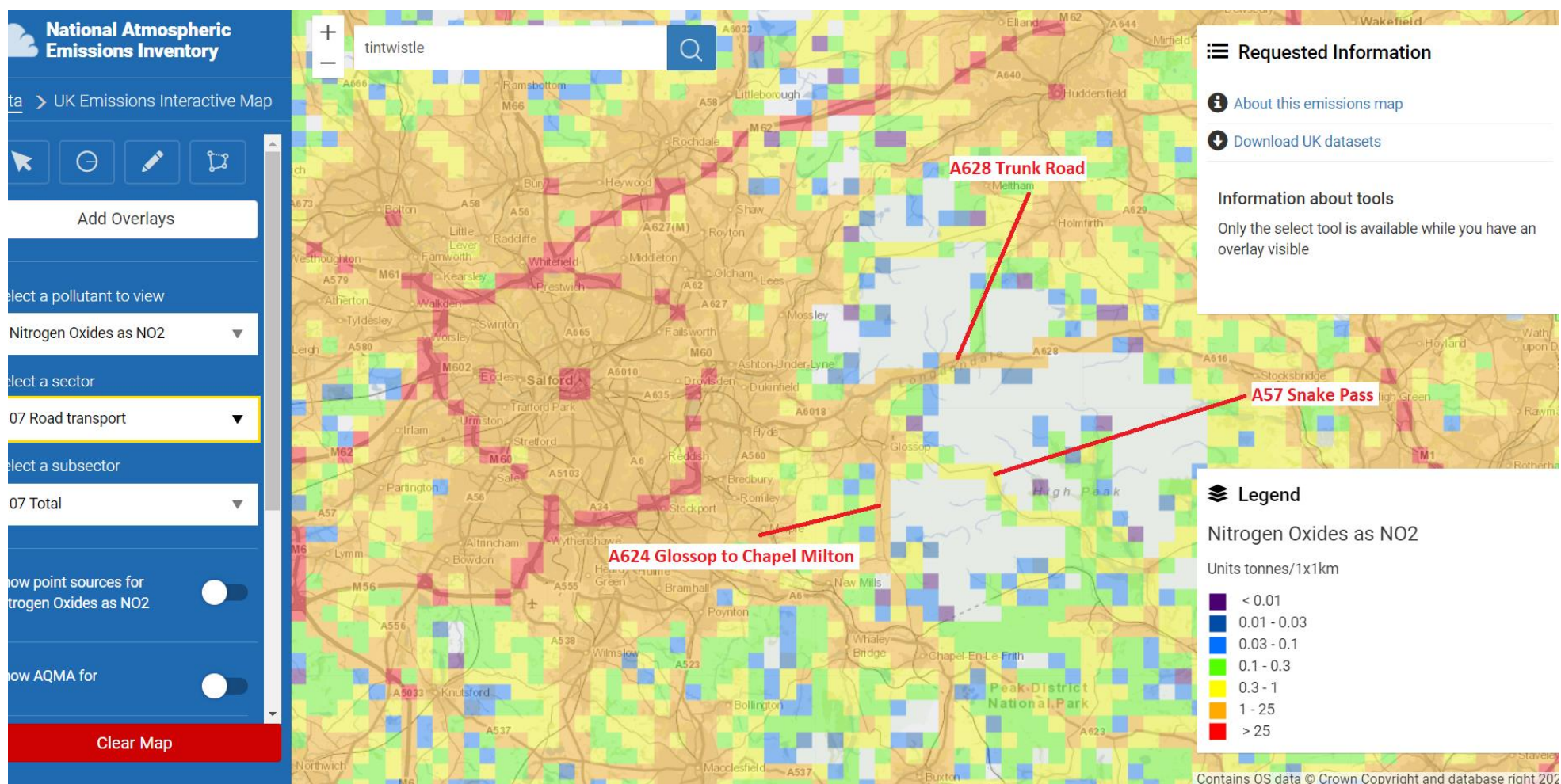
Table 6.1 – Annual mean totals for NO_x at HP2a and HP5 monitoring sites¹²

| Year | HP2a (annual mean NO _x in µg/m ³) | HP5 (annual mean NO _x in µg/m ³) |
|------|--|---|
| 2014 | 60.8 | 50.2 |
| 2015 | 65.0 | 51.8 |
| 2016 | 60.2 | 49.9 |
| 2017 | 59.5 | 50.9 |
| 2018 | n/a | 47.0 |

- 6.1.6 Nitrous oxide emissions generally act as a proxy for other airborne pollutants associated with road transport. Exposure to poor air quality is can have a detrimental effect on health, and is linked with a range of conditions including lung cancer and cardiovascular and respiratory diseases. Children and older people are particularly susceptible to the effects of poor air quality.
- 6.1.7 In addition to being associated with poor health in humans, nitrous oxides are known to have a negative effect on habitats, particularly those that are nutrient deficient. Deposition of nitrous oxide can lead to nitrate enrichment of the soil with a subsequent negative effect on native plants that favour nutrient poor soils. This goes on to affect the habitat and the fauna that it supports.
- 6.1.8 Figure 6.2 shows the current levels of nitrous oxides associated with road transport within the National Park and the surrounding area. The Roads that are expected to be affected by the A57 Link Roads Scheme are shown on the figure.
- 6.1.9 Even without labels the road network can be clearly seen within Figure 6.2, with the motorway network (M56, M60, M62 and M67) clearly seen in red (>25-unit tonnes of NO₂ per km). From the National Park perspective, the nitrogen dioxide profile of the A628 and A624 are important, with both showing 1 - 25-unit tonnes of NO₂ per km.
- 6.1.10 The A57 Snake Pass can also be clearly seen based on NO₂ emissions. It is clear that the level of emissions on the A57 go down considerably as the road enters the National Park. This is in line with the lower levels of traffic currently using the route. Nevertheless, over most of its length, NO₂ emissions are at 0.3 - 1-unit tonnes of NO₂ per km.

¹² Source of information High Peak Borough Council 2018 and 2019 Air Quality Annual Status Report (September 2019) [Executive summary \(highpeak.gov.uk\)](https://www.highpeak.gov.uk/executive-summary)

Figure 6.2 – Nitrous oxide emissions associated with road transport within the vicinity of the A57 Link Roads scheme¹³



¹³ Figure 6.2 is a screen print from the BEIS UK emissions interactive map [UK Emissions Interactive Map \(beis.gov.uk\)](https://ukemissions.beis.gov.uk/)

6.2 Cultural Heritage

- 6.2.1 The Peak District National Park was designated to further the “*conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park*”¹⁴. Paragraph 49 of the English National Parks Vision and Circular (2010) states that: -

*“Cultural heritage and landscape are fundamental to quality of place and, as they are central to attractiveness, distinctiveness, diversity and quality of place in the Parks, should be protected and enhanced.”*¹⁵

- 6.2.2 The Peak District National Park Management Plan lists seven special qualities; Special Quality 4 is ‘Landscapes that tell a story of thousands of years of people, farming and industry’. The National Park Management Plan describes the Peak District National Park as “*a lived-in landscape that has been shaped by people for thousands of years.*”

- 6.2.3 Visitors to the National Park are surrounded by cultural heritage, including prehistoric monuments, stately homes, packhorse bridges and former railways. The National Park Management Plan describes these features in the following way: -

“The landscape itself bears witness to these past lives, having been transformed by people. The Peak District National Park’s famous grassy dales and open moorland have been largely created by people and their industry; moulded by over 10,000 years of woodland clearance and thousands of years of agricultural development. Subsequent industries supporting generations of local people have further shaped the landscape, leaving distinctive imprints in managed woodlands, mine shafts, meadows, quarry faces and lead rakes. Many of these have become unique habitats.”

- 6.2.4 The roads that are expected to see the largest changes in traffic flows within the Peak District National Park are the A628(T) and A57 Snake Pass. Changes are also predicted for the A624 between Glossop and Hayfield and for Monks’ Road. The A628 (T) passes through the Tintwistle Conservation Area, whilst the A624 passes through the Little Hayfield Conservation Area. In addition, there are a number of heritage features in close proximity to these roads including listed buildings or structures, and several Scheduled Monuments – SMs (see Figure 6.3). None of these assets would be directly physically impacted, but the proposed scheme would impact to some degree upon their settings, which will affect how the assets are experienced.

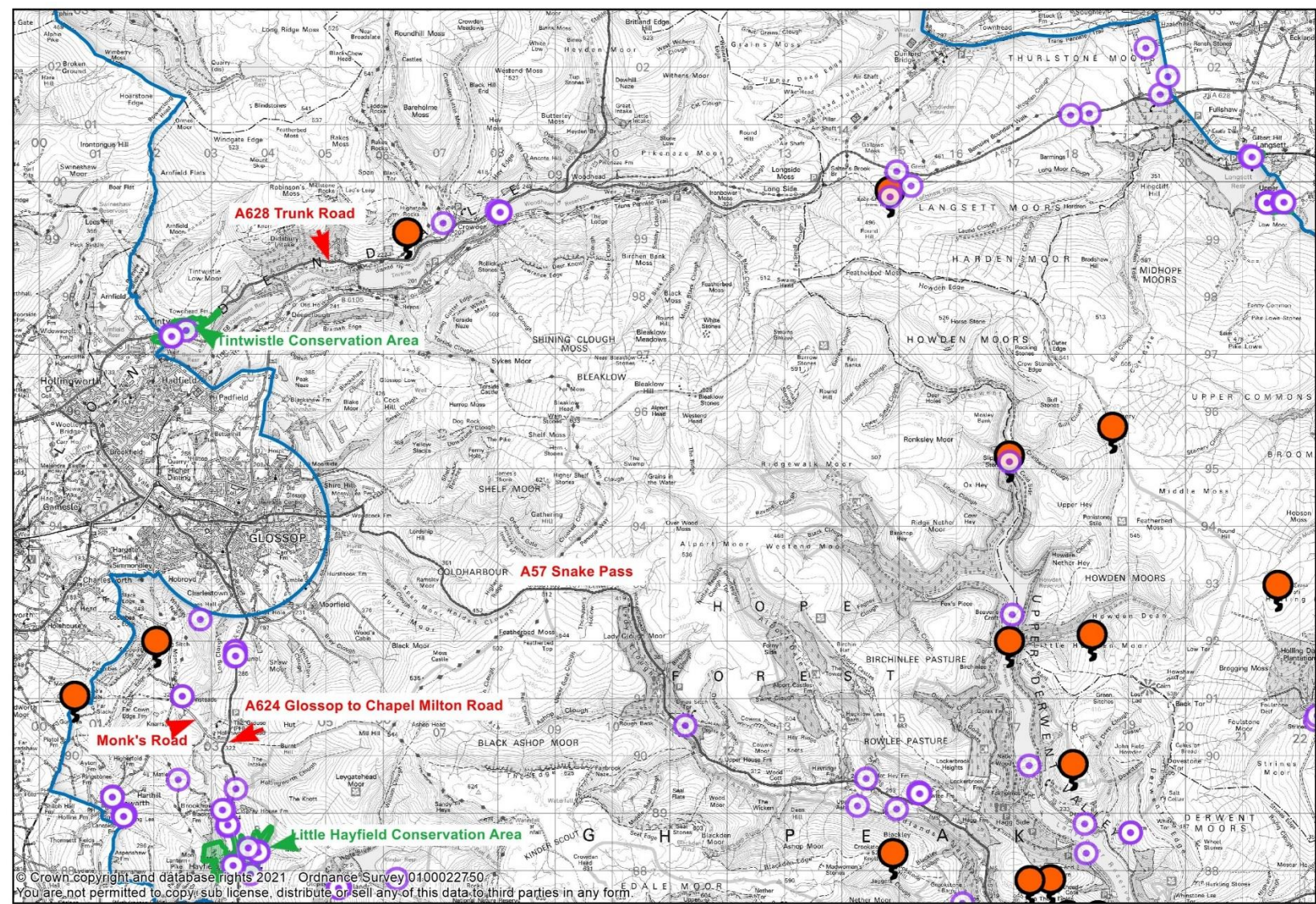
- 6.2.5 Designated heritage features include the following: -

- A628 – Tintwistle Sunday School (Grade II); Tintwistle Sunday School wall and railings (Grade II); Roman fortlet, east of Highstones (SAM); Valve Station, west of Bleak House (Grade II); Bleak House (Grade II), Wall and railings at Bleak House (Grade II); Milepost on Woodhead Road (Grade II); Milepost on Woodhead Road east of Dog & Partridge (Grade II); Ellerslie Lodge (Grade II)

¹⁴ Section 61 of the Environment Act (1995) [Environment Act 1995 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1995/24/section/61)

¹⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

Figure 6.3 – Designated Cultural Heritage features within the Peak District National Park adjacent to roads predicted to experience changes in traffic flow as a result of the A57 Link Roads Scheme



- A57 Snake Pass – Milestone opposite Snake Inn (Grade II); Round cairn and clearance cairn 770m north west of Crookhill Farm (SAM); Round cairn 430m west of Crookhill Farm (SAM); Bronze Age field system, 400m south east of Ladybower Inn (SAM); Romano-British farmstead 475m east of Ladybower Inn (SAM); Romano-British farmstead and post-medieval charcoal burning site 570m north east of Ladybower Inn (SAM); Hordron Edge stone circle, 540m south east of Cutthroat Bridge (SAM); Milepost A57 near Moscar Cross Farm (Grade II)
- A624 Glossop to Hayfield road – Horseshoe Farm (Grade II); Horseshoe Cottage (Grade II); The White House (Grade II); Cruck Barn South of Shepley farmhouse (Grade II); 2-3 Carr Meadow Cottages (Grade II); Carr Meadow Cottage (Grade II); Brookhouses (Grade II); Barn at Marl House (Grade II); Marl House (Grade II); Hay Barn at Marl House (Grade II)
- Monks Road – Plainsteads Farmhouse (Grade II); Outbuildings to Plainsteads (Grade II); Round cairn between Coombes Edge and Cown Edge (SAM).

6.3 Landscape and visual

6.3.1 The Peak District National Park was designated to further the “*conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park*”¹⁶. Paragraph 7 of the English National Parks Vision and Circular (2010)¹⁷ states that: -

“Together with the Broads, the National Parks combine a range of stunning landscapes which are rich in wildlife, biological diversity, geological diversity, archaeology and heritage, with a myriad of opportunities for outdoor recreation. They are home to over 313,000 people and attract millions of visitors every year.”

¹⁸

6.3.2 The Peak District National Park Management Plan lists seven special qualities; Special Quality 1 is ‘Beautiful views created by contrasting landscapes and dramatic geology’. The National Park Management Plan describes this special quality in the following way “*the combination of contrasting landscapes and dramatic geology across the Peak District National Park creates its famous beautiful views.*”

6.3.3 The Peak District is split into eight Landscape Character Areas; the area through which the roads likely to be most affected by changes in traffic flows as a result of the scheme all lie within the Dark Peak area of the National Park. The National Park Management Plan describes the features of the Dark Peak in the following way: -

“The Dark Peak’s Millstone Grit horseshoe has scattered rock outcrops and deep cloughs across a moorland landscape, its elevation giving panoramic views that contrast the perceived wilderness of the moors with the neighbouring cities. Walk on Holme Moss and enjoy uninterrupted moorland views across miles of blanket bog, heather and peat and out over the neighbouring cities. Experience the unique

¹⁶ Section 61 of the Environment Act (1995) [Environment Act 1995 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1995/24/section/61)

¹⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

¹⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

position of the Peak District National Park, with beautiful views surrounded by urban life.”

6.3.4 The roads that are most likely to be affected by changes in traffic flow as a result of the A57 Link Roads scheme generally enter the National Park and then climb steadily over exposed high-level terrain. In doing so, they cross a range of distinct Landscape Character Types, that are defined within the Peak District National Park Landscape Strategy and Action Plan 2009 – 2019¹⁹.

6.3.4 For the Dark Peak Area, the Peak District National Park Landscape Strategy and Action Plan identifies five distinct Landscape Character Types: -

- Open moors – these are described as *“An open undulating high gritstone plateau with extensive blanket peat covered by cottongrass bog and heather moorland. This is a wild, unsettled landscape with wide views to distant surrounding hills.”*
 - The key characteristics of open moors are: undulating high gritstone plateaus; localised rock outcrops and boulders, in the form of rocky edges and tors; thick deposits of peat with incised groughs (drainage channels); unenclosed heather and grass moorland and extensive areas of blanket bog; rough grazing land; wild, unsettled landscape with vast panoramas over surrounding hills and lower ground.
- Moorland slopes & cloughs – these are described as *“Steep slopes and cloughs rising to open moorland on the high plateaux above, with widespread rough grassland and heather moor, grazed by sheep. This is a wild unsettled landscape with exposed views over lower ground.”*
 - The key characteristics of moorland slopes and cloughs are: steep slopes and cloughs rising to the moorland plateaux above; prominent gritstone outcrops, boulders and scree slopes; thin soils over gritstone bedrock; rough acid grassland, bracken and heather moorland grazed by sheep; exposed views over lower ground, sometimes limited by clough sides; numerous springs and flushes arising on slopes and clough sides; relict areas of oak-birch woodland in clough.
- Enclosed gritstone uplands – these are described as *“An enclosed upland pastoral landscape associated with high uplands, ridge tops and slopes. This is a landscape of isolated stone farmsteads, straight roads and regular fields enclosed by drystone walls, largely reclaimed from moorland during Parliamentary Enclosure. Localised boulder fields and rocky outcrops are a feature in places, often associated with patches of remnant moorland vegetation.”*
 - The key characteristics of enclosed gritstone uplands are: high uplands and ridge tops with some steeper slopes; thin soils over gritstone bedrock with localised pockets of peat; permanent pasture and rough grazing enclosed by gritstone walls; remnant patches of rough land with bracken and gorse, some heather and bilberry; regular

¹⁹ Peak District National Park Landscape Strategy and Action Plan 2009 – 2019 [Peak District Landscape Strategy & Action Plan](#)

pattern of medium to large fields; straight roads with wide verges of grass and, in some places, heather; isolated gritstone farmsteads with stone slate roofs; tree groups around farmsteads providing shelter.

- Reservoir valleys with woodland – these are described as “*Steep sided valleys dominated by large reservoirs. Some of the steep valley slopes have been planted with interlocking blocks of coniferous and mixed plantation woodland while others support acid grassland and clough woodlands. Views along the valleys are framed by woodland and the slopes rising to moorland.*”
 - The key characteristics of reservoir valleys with woodland are: interlocking coniferous and mixed plantation woodland with some limited semi-natural woodland; large reservoirs providing water supplies to adjoining urban areas; steep valley slopes, dissected by cloughs; land was largely cleared of settlement during reservoir construction leaving occasional isolated gritstone farmsteads; pastoral fields bounded by gritstone walls with many relict boundaries.
- Upper valley pastures – these are described as “*A pastoral landscape with a low lying, undulating topography, rising more steeply in places towards nearby hills. Settlement is restricted to dispersed gritstone farmsteads set within a well-defined pattern of small to medium sized fields, mostly bounded by hedgerows, but with some walls. Views are enclosed by valley sides and filtered through scattered hedgerow and streamline trees.*”
 - The key characteristics of upper valley pastures are: a low lying gently undulating topography, rising towards adjacent higher ground; network of streams and localised damp hollows; pastoral farmland enclosed by hedgerows; small to medium sized fields; dense streamline and scattered hedgerow trees; narrow, winding lanes, sunken on slopes; dispersed settlement with isolated farmsteads and small clusters of farms and dwellings.

6.3.6 The A628 and A57 Snake Pass both pass through these landscape area types across the National Park (see Figure 6.4), with travellers on those routes experiencing many of the characteristics described above. Similarly, the A624, A6024 and B6015 pass through some of the landscape area types.

6.3.7 Much of the area of the Dark Peak is uncultivated land, with little signs of development; this is known as the Natural Zone (see Figure 6.5). Generally, there is a presumption against development within the Natural Zone.

Figure 6.4 – Landscape Character Areas of the National Park in the vicinity of roads with traffic flows potentially affected by the A57 Link Roads Scheme

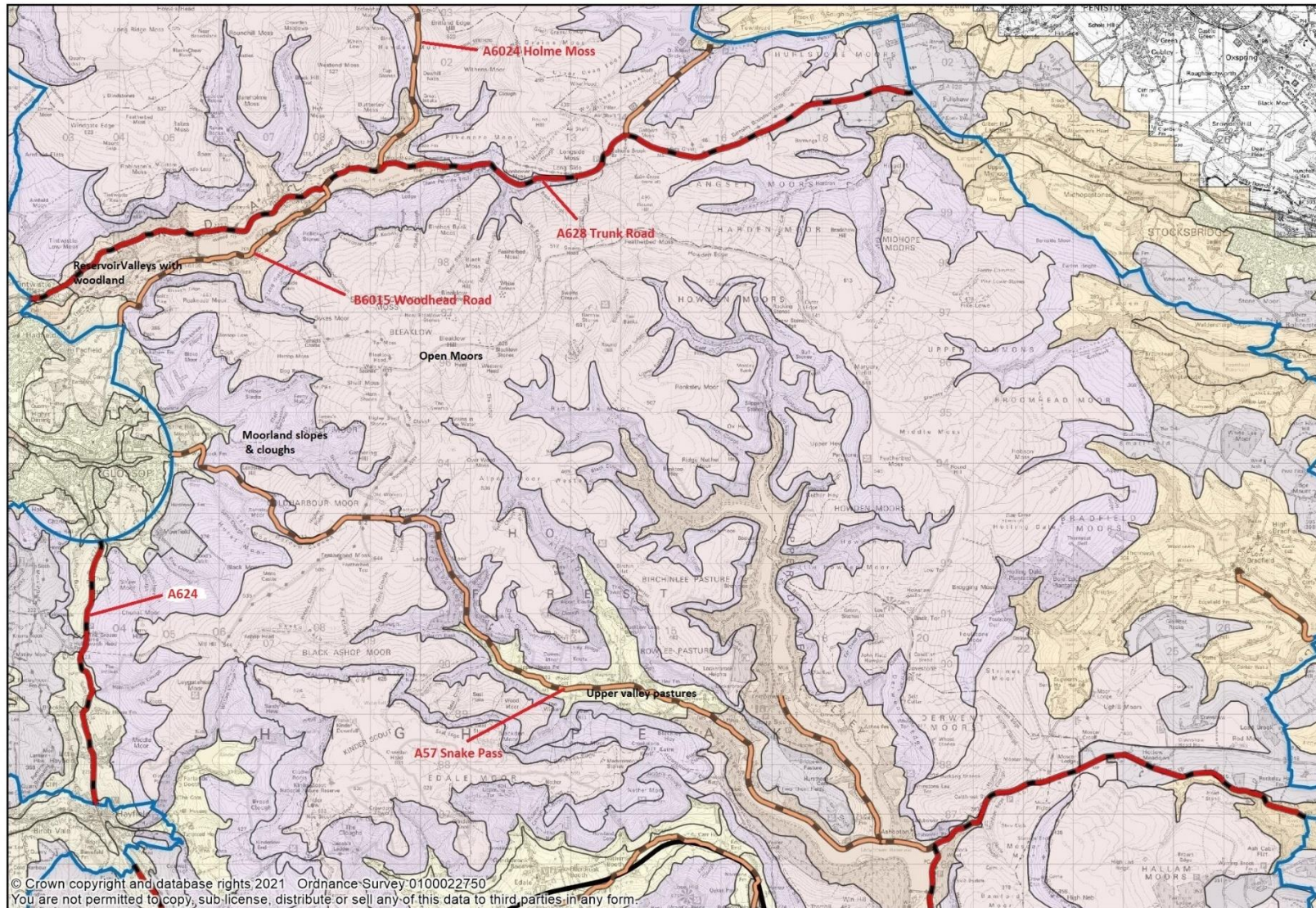
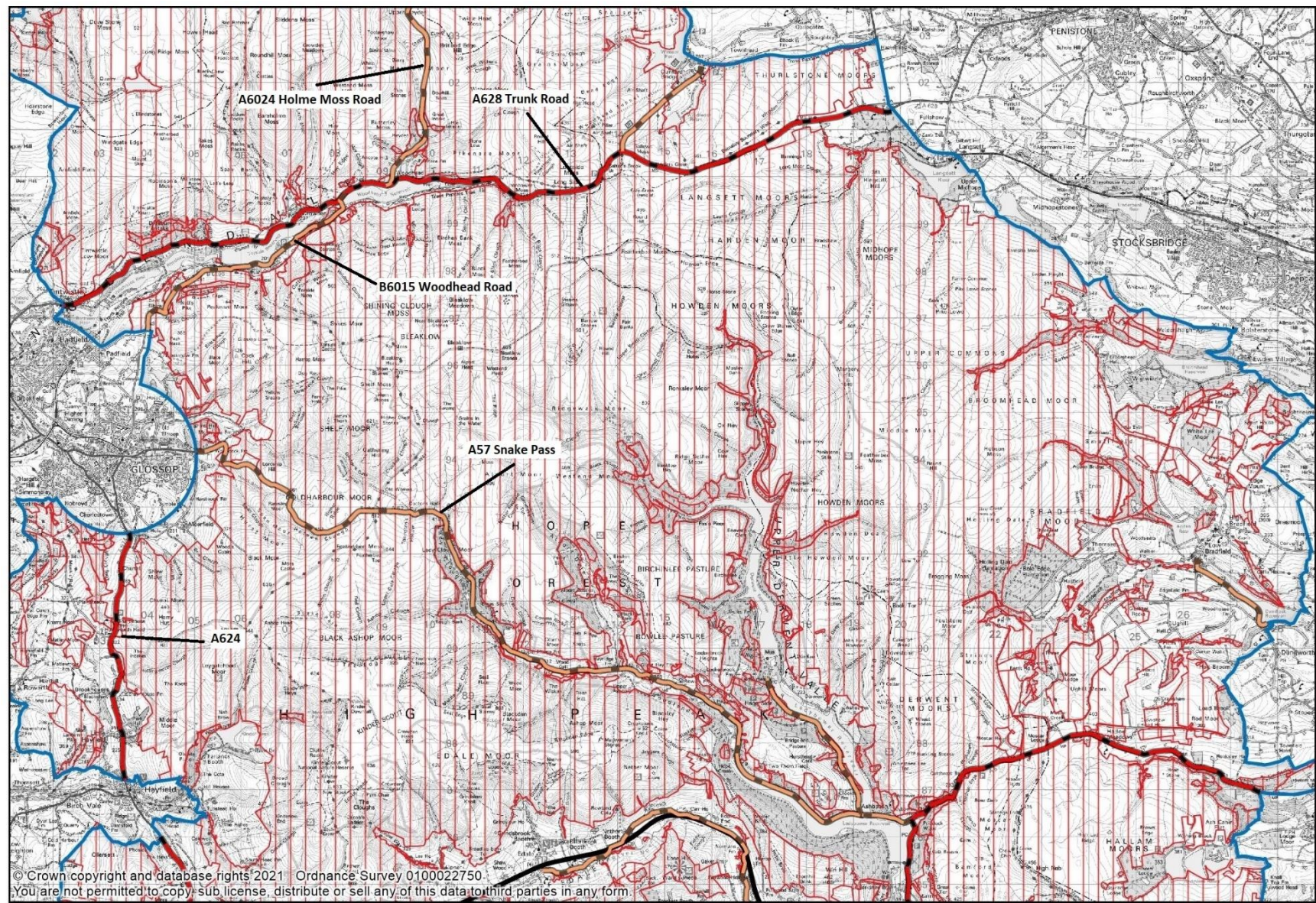


Figure 6.5 – The Natural Zone in the vicinity of roads with traffic flows potentially affected by the A57 Link Roads Scheme



6.4 Biodiversity

6.4.1 Much of the Dark Peak area of the Peak District National Park is subject to additional ecological designations (see Figure 6.6). In most cases, the roads that are predicted to experience a change in traffic flows as a result of the A57 Link Roads scheme pass through these designations: -

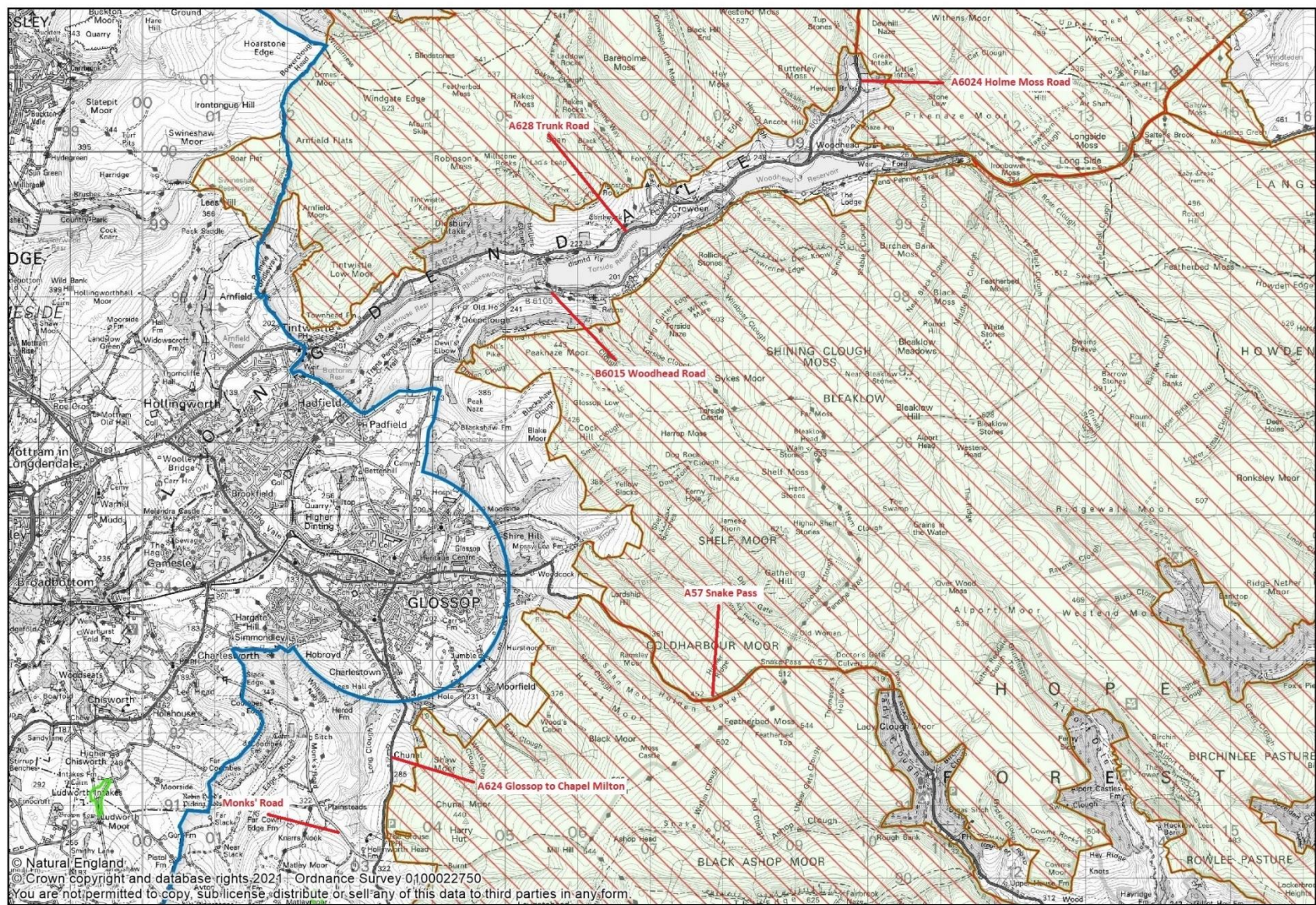
- The A628(T) passes through moorland areas with the following ecological designations; South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI;
- The A57 passes through two distinct areas of moorland designated as SSSI, SAC and SPA. In the west, it passes through the South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI; in the east it passes through the A57 passes through the Peak District Moors SPA and the Eastern Peak District Moors SSSI;
- The A624 is bounded on the east by the following ecological designations; South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI
- The A6024 passes through moorland areas with the following ecological designations; South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI;
- The B6105 is bounded by the South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI at the Devil's Elbow bend.

6.4.2 Special Areas of Conservation are designated to protect rare or threatened habitats. The Annex I habitats that are the primary reason for selection of the South Pennine Moors SAC are – 4030 European dry heaths; 7130 Blanket bogs and 91A0 Old sessile oak woods with Ilex and Blechnum. The South Pennine Moors SAC has the following site character: -

- Inland water bodies (Standing water, Running water) (1%);
- Bogs, Marshes, Water fringed vegetation, Fens (42.7%)
- Heath, Scrub, Maquis and Garrigue, Phygrana (45.5%)
- Dry grassland, Steppes (4.8%)
- Humid grassland, Mesophile grassland (4.8%)
- Broad-leaved deciduous woodland (1%)
- Mixed woodland (0.1%)
- Non-forest areas cultivated with woody plants (including Orchards, groves, Vineyards, Dehesas) (0.1%).

6.4.3 The Peak District Moors SPA was designated to protect the following bird species; short-eared owl, merlin and golden plover.

Figure 6.6 – Ecological designations in relation to road network



6.5 Noise and vibration

6.5.1 The Peak District National Park is associated with a range of special qualities that combine to make the National Park a unique and treasured place at the heart of the nation. The special qualities of the Peak District National Park are defined within the Peak District National Park Management Plan (2018-23)²⁰.

6.5.2 The Peak District National Park Management Plan lists seven special qualities; Special Quality 3 is 'Undeveloped places of tranquillity and dark night skies within reach of millions'. The National Park Management Plan describes the Peak District National Park as "*an accessible backdoor wilderness allowing millions of people to find a welcome sense of tranquillity.*"

6.5.3 The National Park has acted as a tranquil refuge for more than 70 years. A sense of tranquillity delivers both physical and mental health and well-being benefits. The National Park Management Plan describes these benefits in the following way: -

"As modern life offers fewer opportunities for tranquillity, the Peak District National Park's tranquil places are all the more important. They offer a powerful sense of timelessness and escape, with the relative peace and quiet in stark contrast to the hustle and bustle of the surrounding cities."

6.5.4 However, even though the National Park does offer areas of tranquillity, the noise associated with road traffic is an auditory intrusion on this tranquillity. For users of the high moorland stretch of the Longdendale / Trans Pennine Trail; the noise of traffic on the A628 approaching Longside is audible before the road itself is visible.

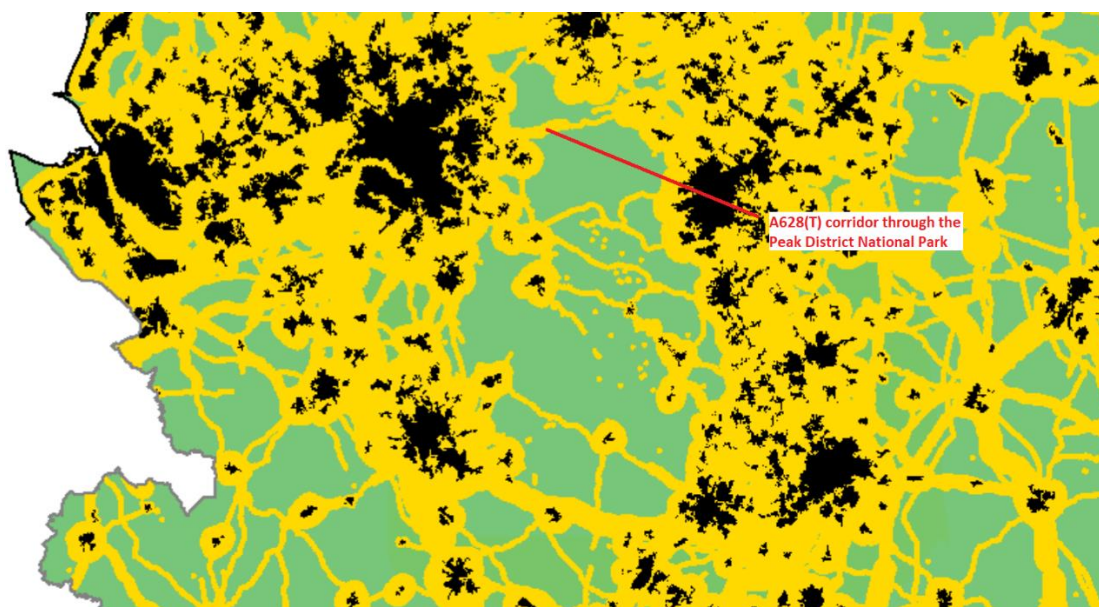
6.5.5 Similarly, whilst the A628 is separated from users of the lower section of the Trans Pennine Trail by the width of the valley and the Longdendale valley reservoirs, the road is still audible; albeit as a distant rumble.

6.5.6 Visitors to the high gritstone edges that parallel the A57 Snake Pass are reminded of the presence of an often not visible road by the sound of traffic. This is particularly the case at weekends when high-revving motorcycle engines often obscure the sounds of birdsong, the breeze or the trickle of water in the cloughs.

6.5.7 The Campaign for Rural England produced an intrusion map for England in 2007. The maps show areas of noise and visual intrusion is quite clear on this map where the major road network is located within the Peak District National Park (see Figure 6.7)

²⁰ https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0040/378949/National-Park-Management-Plan-2018-23-2020-Update.pdf

Figure 6.7 – Intrusion Map for the Peak District National Park²¹



6.6 Population and health

- 6.6.1 The overall population of the Peak District National Park is approximately 38,000. However, this population is disproportionately distributed across the National Park, with the majority of residents living in the larger settlements of the White Peak and Hope Valley.
- 6.6.2 There are relatively few settlements within the National Park that are located either close to the A57 Link Roads scheme. Similarly, few National Park settlements are located on the roads that are predicted to see changes in traffic flow as a result of the scheme.

Tintwistle

- 6.6.3 Tintwistle is a settlement located on the western edge of the Peak District National Park. The village is divided east and west by the National Park boundary, with the eastern half of the village falling inside the National Park. The A628 Trunk road passes through the village of Tintwistle.
- 6.6.4 The A628 carries large numbers of vehicles through Tintwistle. According to the DfT Road Traffic Statistics webpages²², 12,324 vehicles per day passed the cordon point at Crowden, east of Tintwistle in 2019. Of these vehicles, 1,629 were HGVs (13%).
- 6.6.5 This high level of vehicles and the nature of the gradient to the east of the village has led to the declaration of an Air Quality Management Area for nitrous oxides at the eastern end of Tintwistle (see Section 6.1).
- 6.6.6 The high levels of traffic through Tintwistle also lead to exposure to traffic noise for residents, with the relatively high proportion of HGVs adding to the general traffic noise. The high levels of traffic also lead to severance, making crossing the road difficult.

Rights of Way

²¹ This image is taken from the CPRE Intrusion Map – England early 1990s (2007)

²² [Map Road traffic statistics - Road traffic statistics \(dft.gov.uk\)](https://www.dft.gov.uk/road-traffic-statistics)

6.6.7 There is an extensive rights of way network across the Dark Peak Area of the Peak District (see Figure 6.8). In addition to footpaths and bridleways, the area is crossed by a number of nationally important routes – the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. These routes cross both the A628 Trunk Roads and the A57 Snake Pass within the National Park. The principle crossing points are: -

- The A628 Trunk Road
 - The Pennine Bridleway crossing point at the eastern edge of Tintwistle
 - The Pennine Way crossing at Torside
 - The Longdendale / Trans Pennine Trail crossings at Woodhead Station, Longside End and Carr Bottom
- The A57 Snake Pass
 - The Pennine Way crossing at Snake Summit

6.6.8 These and other crossing points on the A628 and A57 in particular can be difficult to use due to existing levels of traffic. Users of these routes are also exposed to traffic noise, dust and vehicle fumes when utilising these crossing points. Appendix A shows contains photos detailing the effect of the A628(T) on users of the Trans Pennine Trail between Woodhead Station and Longside End²³.

Road Safety

6.6.9 The Peak District National Park is crossed by a number of rural roads that are subject to the climate and geography of the Peak District. This means that many of the roads rise from valley bottoms with twists and turns that follow rivers before crossing are over high and exposed ground. Many of these high level routes are closed on a regular basis due to snow, winds or flooding. These severe weather events appear to becoming more frequent; it is likely that with the ongoing effects of climate change, such events may be more frequent and / or more severe in the future.

6.6.10 Peak District roads carry a mix of traffic, with differing knowledge and expectations of the road network. Residents are familiar with their local roads and use them frequently; the same can be said of both in-bound and out-bound commuters. Cross-Park traffic can be made up of a mix of those who are familiar with the roads and those who are not, the same is true of business traffic.

6.6.11 The ease of access of the National Park by car means that a large proportion of road users in the National Park are visitors, particularly at weekends, on Bank Holidays and during school holidays. The Peak District is also very popular with leisure motorcyclists and leisure cyclists. This mix of traffic can lead to issues with road safety. The Peak District National Park contains some routes that have frequently been assessed as high risk by Road Safety Foundation European Road Assessment Programme (EuroRAP). One of these roads is the A57 Snake Pass which is described as a “*persistently high-risk road*”²⁴.

²³ Taken during a site visit on a weekday in September 2017.

²⁴ <http://rsfmaps.agilysis.co.uk/>

6.6.12 Both the A628 and A57 Snake Pass have seen a significant number of road traffic collisions between 2016 and 2020. Data for Killed or Serious Injury collisions from CrashMap for both roads can be seen in Figures 6.9 to 6.11²⁵.

²⁵ Figures produced from screen prints taken from the CrashMap webpages [CrashMap](#)

Figure 6.8 The Rights of Way Network in the vicinity of the A57 Link Roads Scheme

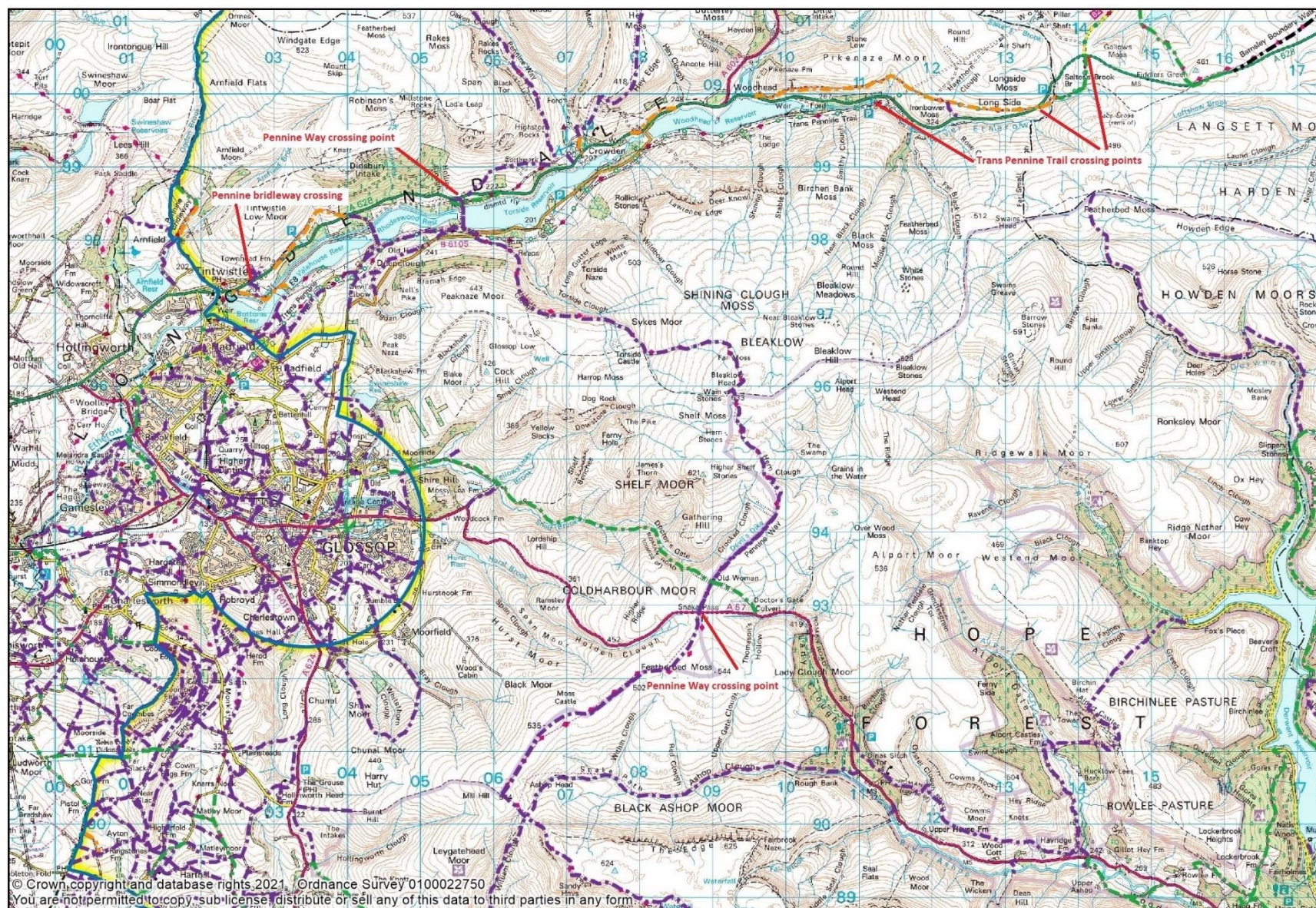


Figure 6.9 Crash map A57 Snake Pass West 2016-2020 taken from CrashMap

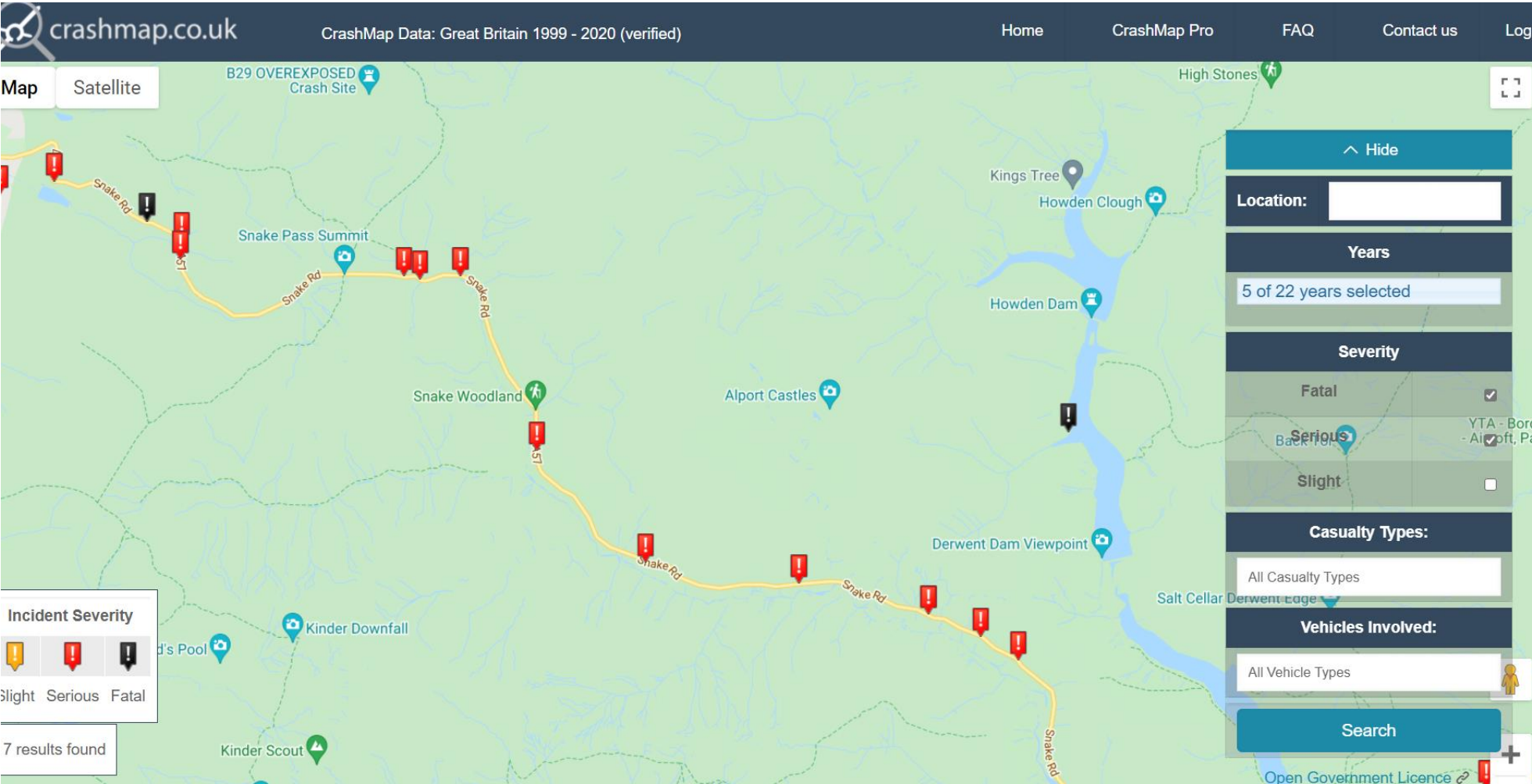


Figure 6.10 Crash map A57 Snake Pass East 2016-2020 taken from CrashMap

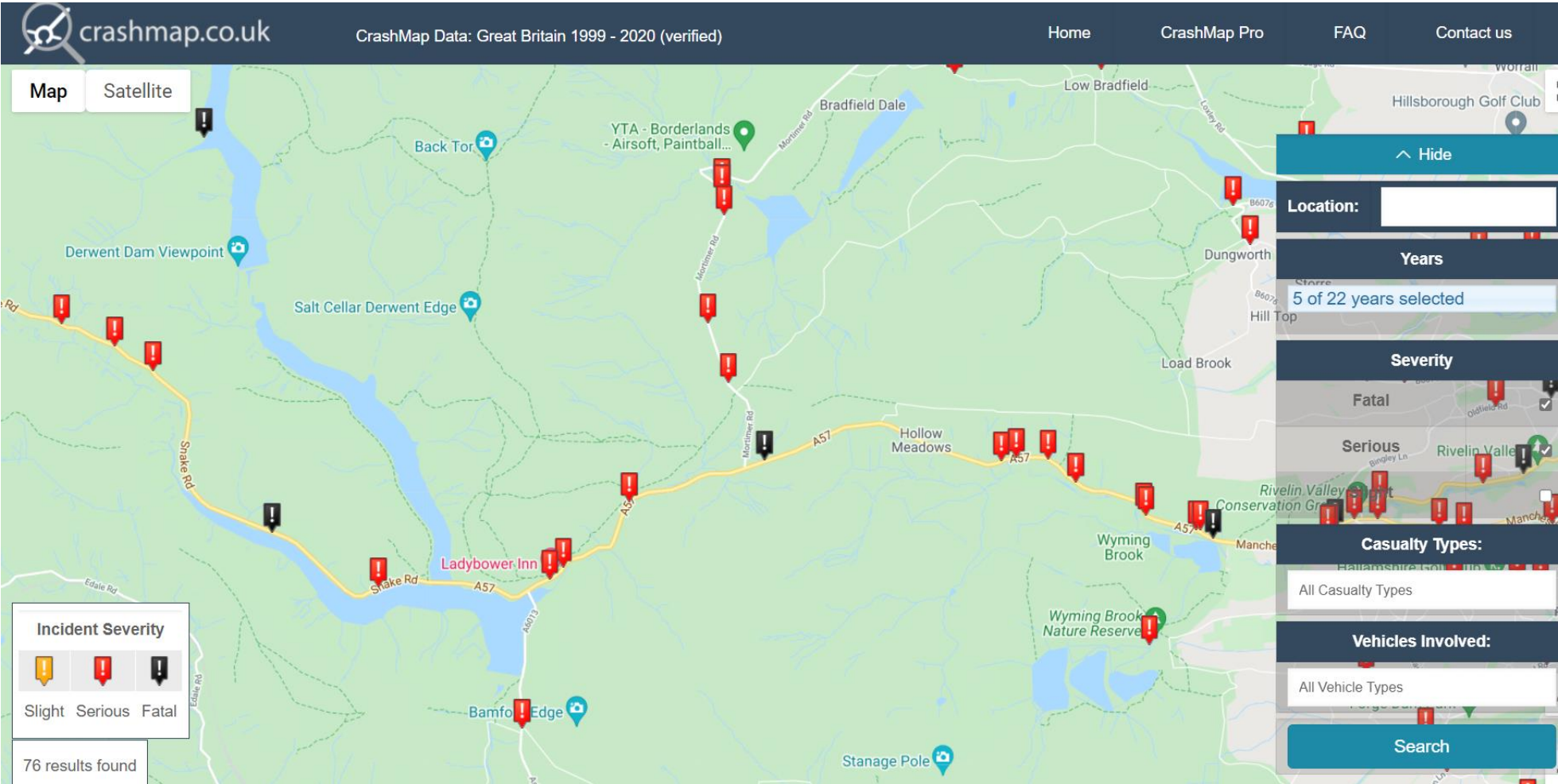
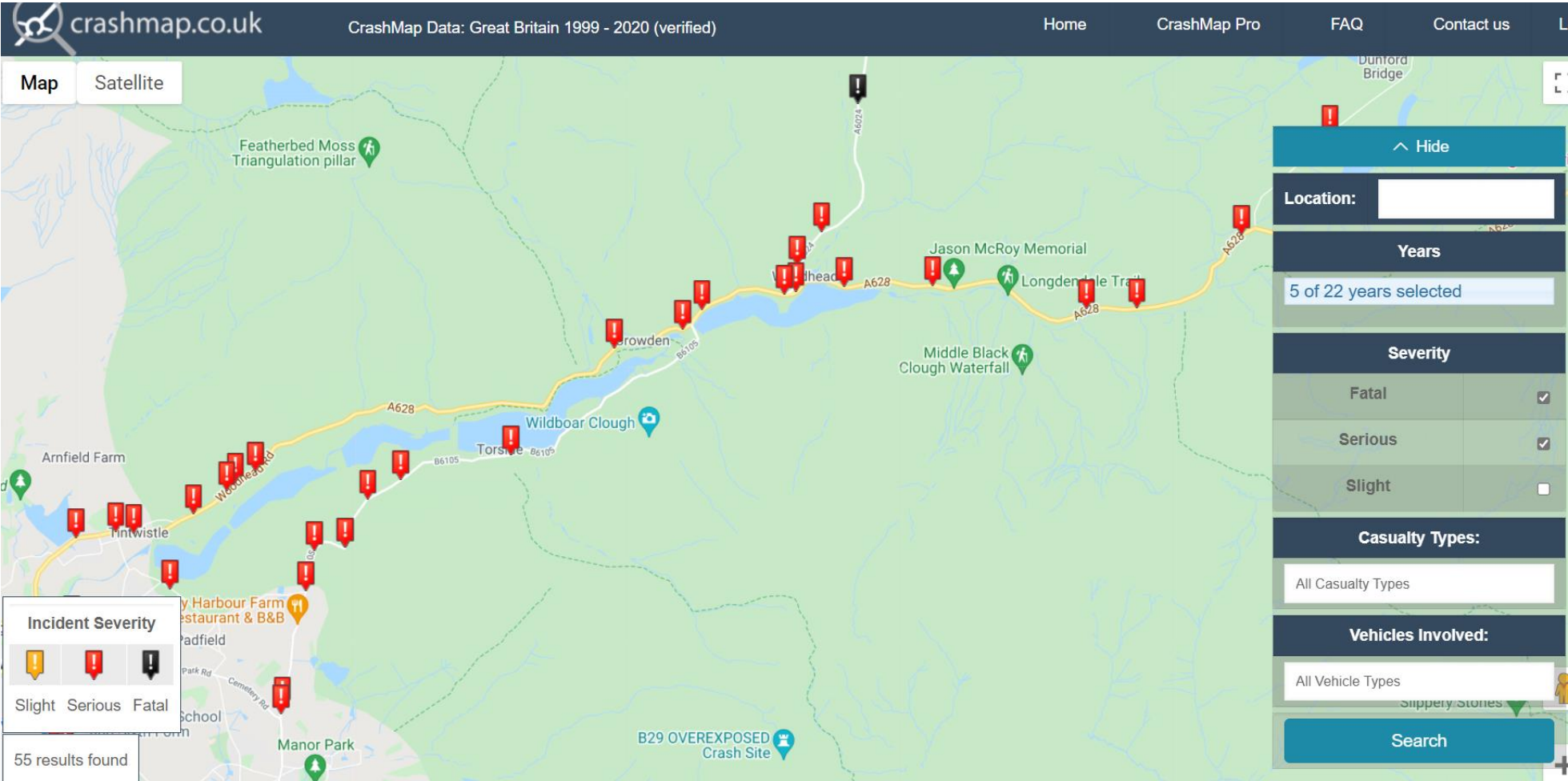


Figure 6.11 Crash map A628 Trunk Road West 2016-2020 taken from CrashMap

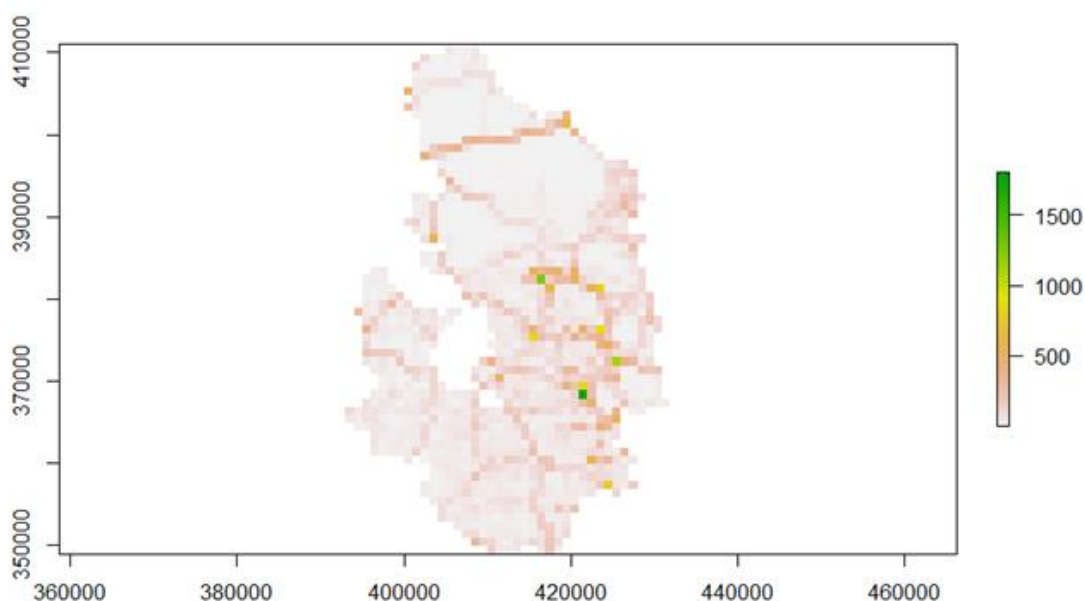


6.7 Climate

Carbon Emissions

- 6.7.1 Excluding point sources, by far the largest CO₂ within the Peak District National Park emissions come from road transport. The 'A' road network in the Peak District National Park can be clearly seen in Figure 6.12; particularly the A628. The hot spots in Castleton, Baslow and Bakewell can also be clearly seen. The link between carbon emissions and Transport has been firmly established, and the continued growth in traffic across the National Park is a source of increased Carbon emissions associated with these journeys.

Figure 6.12 Road transport carbon dioxide emissions within the Peak District



- 6.7.2 Figure 6.13 provides further detail on the Peak District road transport related carbon emissions in the vicinity of the A57 Link Roads scheme. Figure 6.13 shows the current levels of carbon dioxide as carbon, associated with road transport within the National Park and the surrounding area. The Roads that are expected to be affected by the A57 Link Roads Scheme are shown on the figure.
- 6.7.3 Even without labels the road network can be clearly seen within Figure 6.2, with the motorway network (M56, M60, M62 and M67) clearly seen in red (>1,995 units of CO₂ as carbon). From the National Park perspective, the carbon dioxide as carbon profile of the A628 and A624 are important, with both showing 100 - 1,995 units of CO₂ as carbon.
- 6.7.4 The A57 Snake Pass can also be clearly seen based on CO₂ emissions. It is clear that the level of emissions on the A57 go down considerably as the road enters the National Park. This is in line with the lower levels of traffic currently using the route. Nevertheless, over most of its length, CO₂ emissions are at 32 - 100 units of CO₂ as carbon.

Transport Flow / Usage

- 6.7.5 The Peak District National Park is the fourth largest National Park in the United Kingdom. It is surrounded by large conurbations, such as Sheffield, Manchester and Derby, which increase cross-Park movements and commuting. The Peak District National Park also attracts a high volume of tourist visits. 16.1 million People live within 40 miles or approximately one hours' driving time of the National Park boundary. This attracts between somewhere between 13 million and 26 million per annum of which we know roughly 8 in 10 come by car²⁶.
- 6.7.6 Traffic flow data is collated from a number of roads within the National Park. Historically traffic growth within the National Park was roughly in line with or below National levels of around 2% per annum. However, from 2009 onwards there was a fluctuating decline in average flows across the Park to 2013; with the Average Annual Daily Total (AADT) falling to 5,780; 7% lower than the 2009 total of 6,216 but this trend has reversed with 6,547 vehicles in 2017 (see below).

Average annual daily traffic flows 2017

- Cross-Park Roads²⁷ 8,563 (-1.82% on 2016)
- A Roads²⁸ 7,341 (+0.60% on 2016)
- Recreational Roads 3,737 (+2.08% on 2016)

Overall Combined Average 6,547 (-0.19% on 2016)

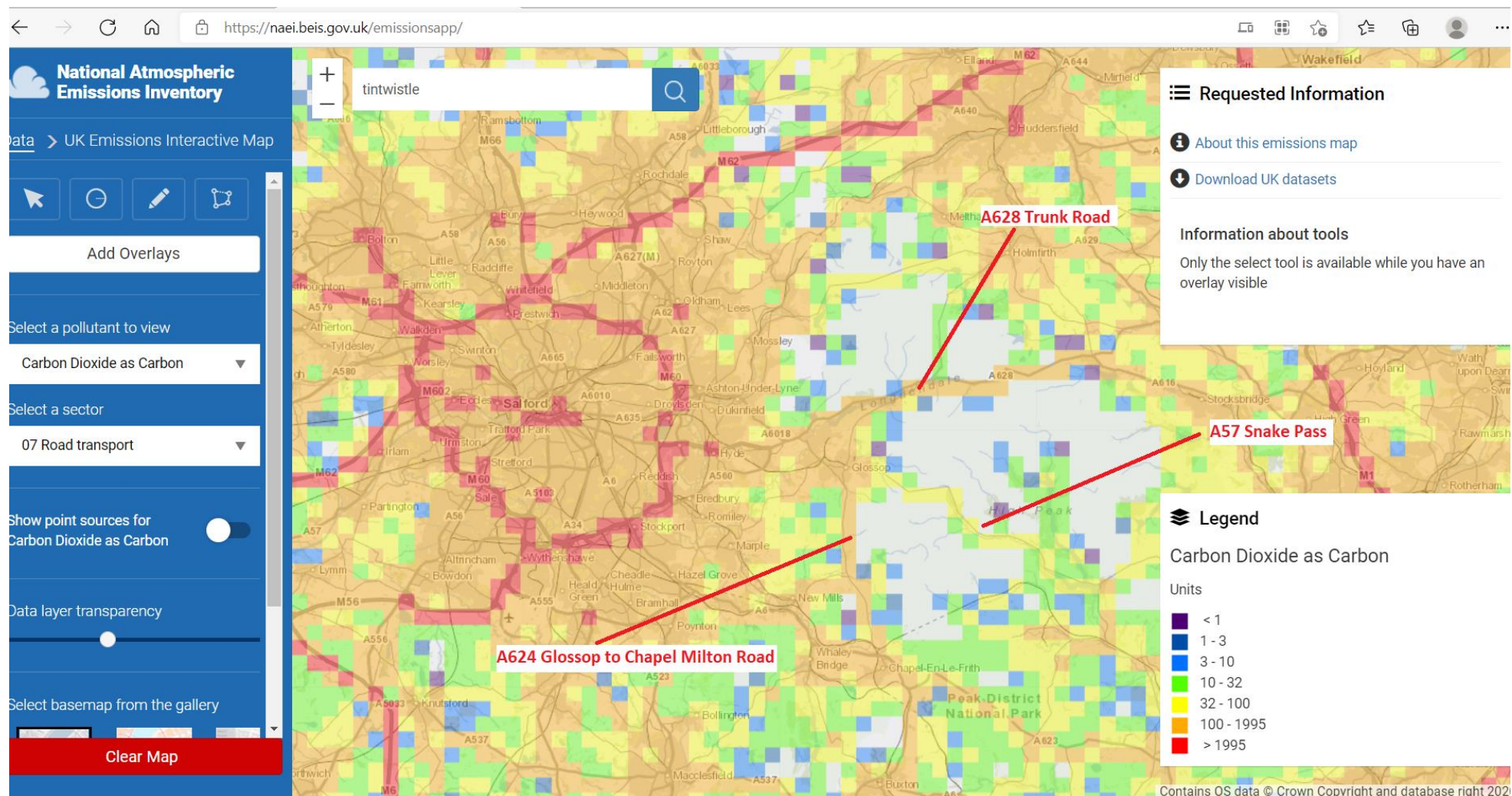
- 6.7.7 The Touche Ross Assessment of visitor numbers in 1996 estimated that during the peak July – Aug period the percentage of vehicles due to recreational visitors on major routes was 40% (39.5%) and on minor roads 24.2%.
- 6.7.8 There are 38,000 residents and 18,360 dwellings in the Peak District. There is approximately, 26,438 cars or vans in Peak District Households. In England & Wales 74% of households have access to a car or van compared with 89% in the Peak District. Access to services is more difficult in rural areas and therefore we see above average Car or Van ownership and more than likely above average use of cars (see Table 6.2).

²⁶ PDNPA Visitor Survey 2015

²⁷ AADT Data from the A619 East of Baslow site was estimated for 2017, due to significant gaps in the available data. The estimated figure utilised the 2016 AADT figure multiplied by the average growth figure for other Cross-Park roads used for the AMR.

²⁸ AADT Data from the A54 Macclesfield Road site was estimated for 2017, due to significant gaps in the available data. The estimated figure utilised the 2016 AADT figure multiplied by the average growth figure for other A roads used for the AMR.

Figure 6.13 – Carbon dioxide emissions associated with road transport within the vicinity of the A57 Link Roads scheme²⁹



²⁹ Figure 6.2 is a screen print from the BEIS UK emissions interactive map [UK Emissions Interactive Map \(beis.gov.uk\)](https://naei.beis.gov.uk/emissionsapp/)

Table 6.2 – KS404EW Census 2011 Car or Van Availability

| KS404EW | Peak District National Park | % | England & Wales National Park Average | % | England & Wales | % |
|--|------------------------------------|----------|--|----------|----------------------------|----------|
| All categories: Car or van availability* | 16,461 | | 13,466 | | 23,366,044 | |
| No cars or vans in household* | 1,864 | 11.3 | 1,670 | 12.4 | 5,989,770 | 25.6 |
| 1 car or van in household* | 6,259 | 38.0 | 5,472 | 40.6 | 9,861,642 | 42.2 |
| 2 cars or vans in household* | 5,976 | 36.0 | 4,486 | 33.3 | 5,777,662 | 24.7 |
| 3 cars or vans in household* | 1,649 | 10.0 | 1,275 | 9.5 | 1,283,780 | 5.5 |
| 4 or more cars or vans in household* | 713 | 4.3 | 563 | 4.2 | 453,190 | 1.9 |
| All cars or vans in the area** | 26,438 | | 20,868 | | 27,294,656 | |

*(Households) **(Cars or Vans)

- 6.7.9 People living in both rural and urban areas make a similar numbers of trips per person per year. Whilst the majority of driving trips made by individuals living in urban areas are shorter than 5 miles, for most rural drivers their typical car journeys are longer than 5 miles³⁰.

Current & Future Transport Trends (National)

- 6.7.10 Prior to the Covid-19 pandemic, 64% of all trips were made by Car (78% of total trip distance). Most transport modes are used for a mixture of purposes, however over half (57%) of all trips by rail were for commuting/business purposes³¹.
- 6.7.11 The total net domestic emissions from all transport sources is 124.4 million Tonnes of CO₂ equivalent. Twenty-one percent of UK domestic greenhouse gas emissions were from transport in 2015, up from 15% in 1990. The vast majority of total domestic transport greenhouse gas emissions were from road transport (93%). Cars and taxis were responsible for 54%, down from 60% in 1990³². While the proportion from vans

³⁰ Department of Transport: Transport Statistics Great Britain (2015) [Transport Statistics Great Britain: 2015 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/428122/transport-statistics-great-britain-2015.pdf)

³¹ Department of Transport: National Travel Survey (2005 - 2015) [National Travel Survey Factsheet: Mode Use 2005 - 2015, a view into a travel week \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/428122/national-travel-survey-factsheet-mode-use-2005-2015-a-view-into-a-travel-week.pdf)

³² Department of Transport: National Travel Survey (2005 - 2015) [National Travel Survey Factsheet: Mode Use 2005 - 2015, a view into a travel week \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/428122/national-travel-survey-factsheet-mode-use-2005-2015-a-view-into-a-travel-week.pdf)

has increased from 8% to 13% of emissions. The total emission of greenhouse gases from transport is largely unchanged since 1990.

- 6.7.12 There has been a long term (2000/2014) decrease in new car fuel consumption due to more fuel-efficient cars (Petrol -31% and Diesel -25%). However, this has not been sufficient to offset the increase in emissions due to greater car ownership and the resulting increase in total miles driven.

7. Peak District Roads potentially affected by the scheme

7.1 The Current Situation

A628 Trunk Road

- 7.1.1 The A628 Trunk road crosses the north of the Peak District National Park between Tintwistle in the west and Flouch in the east. The road is managed by National Highways and provides a strategic link between the M1 in South Yorkshire and the M67 in Greater Manchester. The A628(T) within the National Park consists of a single carriageway road with one set of dual carriageway to allow overtaking via an additional climbing lane to the west of Flouch. The road is subject to the National speed limit for most of its length within the National Park.
- 7.1.2 The A628(T) is a high-level route crossing high ground over the Woodhead summit; it is often closed during the winter due to snow-fall or other poor weather conditions³³. The road follows the Longdendale valley and accordingly has a number of bends along the route.
- 7.1.3 There are two main visitor car parks along the route within the National Park, Crowden and Woodhead Station. The car parks serve visitors to the Woodhead reservoirs, the Trans-Pennine Trail, the Pennine Way and other off-road walking / cycling routes.
- 7.1.4 The A628(T) is subject to a number of crossing points for important walking and cycling routes, including: -
- The Pennine Bridleway crossing point at the eastern edge of Tintwistle
 - The Pennine Way crossing at Torside
 - The Longdendale / Trans Pennine Trail crossings at Woodhead Station, Longside End and Carr Bottom
- 7.1.5 According to the DfT Road Traffic Statistics webpages³⁴, there are four manual traffic count points on the A628(T) within the National Park: -
- i) Site number: 7373; Crowden (west of junction with B6105)
 - ii) Site number: 57435; Woodhead (east of junction with B6105, west of junction with A6024)
 - iii) Site number: 17325; Salter's Brook (east of junction with A6024, west of junction with Windle Edge)
 - iv) Site number: 73013; Dog & Partridge (east of junction with Windle Edge; west of Flouch roundabout).

³³ According to Highways England / National Highways updates the A628 has been closed

³⁴ [Map Road traffic statistics - Road traffic statistics \(dft.gov.uk\)](https://www.dft.gov.uk/road-traffic-statistics)

7.1.6 Data from the count points for 2019³⁵ is provided below within Table 7.1

Table 7.1 – Annual Average Daily Totals (AADT) for A628(T) Traffic Count Points inside the Peak District National Park

| Link No. | Location | AADT (all motor vehicles) | AADT HGVs | Percentage HGVs |
|----------|-----------------|---------------------------|-----------|-----------------|
| 7373 | Crowden | 12,324 | 1,629 | 13.22 |
| 57435 | Woodhead | 13,788 | 1,803 | 13.08 |
| 17325 | Salter's Brook | 12,956 | 1,621 | 12.51 |
| 73013 | Dog & Partridge | 13,148 | 1,693 | 12.88 |

A57 Snake Pass

7.1.7 The A57 Snake Pass crosses the Peak District National Park between Shire Hill in the west and Rivellin Glen in the east. The western part of the route within the National Park is managed by Derbyshire County Council, with the shorter eastern section being managed by Sheffield City Council. The A57 Snake Pass provides a link between Sheffield in the east and Glossopdale / Greater Manchester in the east. The majority of the route is subject to a 50mph speed limit.

7.1.8 The A57 Snake Pass is a high-level route crossing high ground over the Snake summit and at Moscar; it is often closed during the winter due to snow-fall. The road follows river valleys and accordingly has a number of bends along the route. The section between Ladybower and Snake Summit is subject to geological instability and undergoes regular closures for maintenance against slippage.

7.1.9 There are a number of parking areas along the A57 Snake Pass along the route within the National Park. These car parks serve visitors to the Upper Derwent Valley, Alport Castles, Kinder plateau and Bleaklow including numerous walking and cycling routes. The Pennine Way crosses the A57 Snake Pass at Snake Summit.

7.1.10 According to the DfT Road Traffic Statistics webpages, there are three manual traffic count points on the A57 within the National Park: -

- i) Site number: 46584; Snake Woodlands (east of Glossop, west of junction with A6103)
- ii) Site number: 73377; Cutthroat Bridge (east of junction with A6103, east of junction with Mortimer Road)
- iii) Site number: 26576; Hollow Meadows (east of junction with Mortimer Road, west of junction with A6101)

³⁵ Data from 2019 is used as it provides the most recent pre-Covid-19 data available.

7.1.11 Data from the count points for 2019 is provided below within Table 7.2

Table 7.2 – Annual Average Daily Totals (AADT) for A57 Snake Pass Traffic Count Points inside the Peak District National Park

| Link No. | Location | AADT (all motor vehicles) | AADT HGVs | Percentage HGVs |
|----------|------------------|---------------------------|-----------|-----------------|
| 46584 | Snake Woodlands | 4,008 | 136 | 3.39 |
| 73377 | Cutthroat Bridge | 5,732 | 143 | 2.49 |
| 26576 | Hollow Meadows | 5,642 | 160 | 2.84 |

A624 Glossop to Chapel Milton

- 7.1.12 The A624 crosses the Peak District National Park between Gnathole Wood in the north and Hayfield in the South, where it leaves the National Park. South of Hayfield the road enters the National Park near Newhouse Farm. The road continues southwards to White Knowle (north of Chapel Milton), where it again leaves the National Park. The route is managed by Derbyshire County Council. The A624 provides a link between Chapel-en-le-Frith and Chinley in the south and Glossop in the north.
- 7.1.13 The A624 crosses high ground between Glossop and Hayfield (Hollingworth Head), and Hayfield and Chapel Milton (Chinley Head). There are a number of bends on either side of the high ground descending into Glossop, Little Hayfield, Hayfield and Chapel Milton respectively. For the majority of its route inside the National Park, the A624 is subject to a 50mph speed limit.
- 7.1.14 According to the DfT Road Traffic Statistics webpages, there is one manual traffic count point on the A624 within the National Park. The site is numbered 7368 and located north of the junction with Monks' Road and south of Glossop. Data from 2019 provides an AADT for all motor vehicles of 7,370 and an AADT for HGVs of 275; this equates to 3.73% HGVs.

A6024 Holme Moss

- 7.1.15 The A6024 links the A628(T) inside the National Park with Holmfirth in the north east, crossing over Holme Moss summit. The road exits the National Park on the eastern edge of Holme village. The route is managed by Derbyshire County Council to the south-west of Holme Moss summit and Kirklees council to the north-east of Holme Moss summit. The route is subject to the national speed limit for most of its length within the National Park.
- 7.1.16 The A6024 crosses high ground over Holme Moss summit and includes a number of bends. The route is often subject to weather related road closures. The road is an iconic cycling climb and featured in the recent Yorkshire section of the Tour de France. The junction between the A6024 and the A628(T) is challenging for vehicles joining the A628(T) with poor visibility eastwards.

- 7.1.17 There are a number of parking areas along the A6024 Holme Moss route, including at Holme Moss summit. These car parks serve visitors to the area, and provide access to the open countryside.
- 7.1.18 According to the DfT Road Traffic Statistics webpages, there are two manual traffic count points on the A6024 within the National Park:
- i) Site number: 73378; Dewhill Naze (north of the A628 junction, south of junction Holme Moss summit)
 - ii) Site number: 47803; Hill Gate Sike (north of Holme Moss summit, south of junction with Rake Head Road)
- 7.1.19 Data from the count points for 2019 is provided below within Table 7.3

Table 7.3 – Annual Average Daily Totals (AADT) for A6024 Holme Moss Traffic Count Points inside the Peak District National Park

| Link No. | Location | AADT (all motor vehicles) | AADT HGVs | Percentage HGVs |
|----------|----------------|---------------------------|-----------|-----------------|
| 73378 | Dewhill Naze | 1,083 | 5 | 0.46 |
| 47803 | Hill Gate Sike | 1,083 | 5 | 0.46 |

B6015 Woodhead Road

- 7.1.20 The B6015 connects the A628(T) inside the National Park with Glossop in the south-west. The road crosses southwards from the A628(T) over the Woodhead reservoir embankment. It then parallels the Torside, Rhodeswood and Valehouse reservoirs in a westerly direction before turning southwards towards Glossop. The road leaves the National Park just prior to the Padfield Main Road junction. The route is managed by Derbyshire County Council and is subject to a 50mph speed limit for most of its length within the National Park.
- 7.1.21 The B6015 crosses high ground between Glossop and Torside reservoir, and includes a number of over bends. There is a main car park along the B6105 at Torside Reservoir. This car park serves visitors to the area, and provides access to the Woodhead reservoirs, the Trans Pennine Trail and other off-road walking and cycling routes. The junction between the B6105 and the A628(T) is challenging for vehicles joining the A628(T) with poor visibility westwards and a tight turn for west-bound vehicles.
- 7.1.22 According to the DfT Road Traffic Statistics webpages, there is one manual traffic count point on the B6015 within the National Park. The site is numbered 800042 and located adjacent to Torside Car Park. Data from 2019 provides an AADT for all motor vehicles of 2,126 and an AADT for HGVs of 64; this equates to 3.01% HGVs.

Monks' Road

- 7.1.22 Monks' Road connects the A624(T) inside the National Park with Charlesworth and Broadbottom. The road leaves the A624 junction in a north-westerly direction over high ground, and alongside Coombes Edge before descending towards

Charlesworth. The road leaves the National Park to the east of Chapel Brow at Charlesworth. The route is managed by Derbyshire County Council and is subject to a 50mph speed limit for most of its length within the National Park.

- 7.1.23 Monks' Road crosses high exposed ground from its junction with the A624 before descending into Charlesworth. There are a number of parking areas along the route providing access to public rights of way. The route acts as short cut for journeys from the south towards Greater Manchester.

7.2 With the scheme

- 7.2.1 The scheme leads to a general increase in traffic across four of the six roads within the National Park described in section 7.1 when compared to the 'Do Minimum' scenario. It should be noted that the figures produced by the National Highways modelling appear at odds with those available on the DfT website used to populate section 7.1 of this report. In some cases, the figures in 7.1 from 2019 appear to be equal or higher than those provided for the 2025 'Do Minimum' scenario. This may be due to the methods used to derive the DfT data, with manual counts being used to derive AADT figures. However, it also raises the question of possible undercounting through the model.
- 7.2.2 The data provided to accompany the DCO application can be seen in Tables 7.4 and 7.5 in relation to roads and links within the Peak District National Park.

A628 Trunk Road

- 7.2.3 According to the Traffic Modelling data supplied as part of the DCO application, the A628(T) within the National Park will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the opening year (2025): -
- i) Between Tintwistle and the B6105 junction (western section) there will be a total increase of 950 motor vehicles (9%) and an increase of 26 HGVs (2%).
 - ii) Between the B6105 junction and the A6024 junction (middle section) there will be a total increase of 900 motor vehicles (7%) and an increase of 117 HGVs (7%).
 - iii) East of the A6024 junction (eastern section) there will be a total increase of 850 motor vehicles (7%) and a decrease of 13 HGVs (-1%).

The busiest section of the route is between the B6105 junction and the A6024 junction with 14,000 vehicles per day.

- 7.2.4 According to the Traffic Modelling data supplied as part of the DCO application, the A628(T) within the National Park will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the design year (2040): -
- i) Between Tintwistle and the B6105 junction (western section) there will be a total increase of 1,100 motor vehicles (10%) and an increase of 153 HGVs (11%).
 - ii) Between the B6105 junction and the A6024 junction (middle section) there will be a total increase of 950 motor vehicles (7%) and an increase of 105 HGVs (7%).

- iii) East of the A6024 junction (eastern section) there will be a total increase of 900 motor vehicles (7%) and an increase of 108 HGVs (7%).

The busiest section of the route is between the B6105 junction and the A6024 junction with 15,650 vehicles per day.

A57 Snake Pass

- 7.2.5 According to the Traffic Modelling data supplied as part of the DCO application, the A57 Snake Pass will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the opening year (2025): -

- A total increase of 1,150 motor vehicles (38%) and an increase of 11 HGVs (36%).

It is unclear from the model how the traffic will be dispersed eastwards from the A57 Snake Pass beyond the cordon point. Total vehicle flows are predicted to be 4,200 per day.

- 7.2.6 The traffic model indicates the A57 Snake Pass will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the design year (2040): -

- A total increase of 1,450 motor vehicles (38%) and an increase of 14 HGVs (36%).

Total vehicle flows are predicted to be 5,300 per day.

A624 Glossop to Chapel Milton

- 7.2.7 According to the Traffic Modelling data supplied as part of the DCO application, the A624 Glossop to Chapel Milton road will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the opening year (2025): -

- A decrease of 100 motor vehicles (-1%) and an increase of 92 HGVs (32%).

It is unclear from the model how the traffic will be dispersed southwards from the A624 beyond the cordon point. Total vehicle flows are predicted to be 9,550 per day.

- 7.2.8 The traffic model indicates the A624 Glossop to Chapel Milton road will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the design year (2040): -

- A decrease of 600 motor vehicles (-5%) and an increase of 100 HGVs (27%).

Total vehicle flows are predicted to be 11,850 per day.

A6024 Holme Moss

- 7.2.9 According to the Traffic Modelling data supplied as part of the DCO application, the A6024 Holme Moss road will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the opening year (2025): -

- An increase of 100 motor vehicles (14%) and no use by HGVs either with or without the scheme.

It should be noted that the DfT data suggests a current (2019) use of the route by HGVs of 5 per day (0.4% of total flows).

Total vehicle flows are predicted to be 800 per day.

- 7.2.10 The traffic model indicates the A6024 Holme Moss road will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the design year (2040): -

- An increase of 50 motor vehicles (6%) and no use by HGVs either with or without the scheme.

Total vehicle flows are predicted to be 950 per day.

B6015 Woodhead Road

- 7.2.11 According to the Traffic Modelling data supplied as part of the DCO application, the B6015 Woodhead road will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the opening year (2025): -

- A decrease of 50 motor vehicles (-2%) and a decrease of 2 HGVs (-2%).

Total vehicle flows are predicted to be 2,350 per day.

- 7.2.12 The traffic model indicates the B6015 Woodhead road will see the following change in AADT traffic flows with the scheme compared to the 'Do-minimum' scenario in the design year (2040): -

- A decrease of 200 motor vehicles (-6%) and a decrease of 45 HGVs (-25%).

Total vehicle flows are predicted to be 3,450 per day.

Monks' Road

- 7.2.13 National Highways provided the Peak District National Park Authority on request additional traffic flow data for Monks Road. Whilst the information is not comprehensive, it indicates the following: -

- i) An increase of 241 in vehicles in 2025 with the scheme over the 'Do Minimum' scenario, and
- ii) An increase of 654 in vehicles in 2025 with the scheme over the 'Do Minimum' scenario.

Net increase in traffic across the Peak District National Park

- 7.2.14 Whilst the scheme does appear to deliver traffic benefits in specific locations outside of the National Park boundary, the traffic modelling indicates that overall it will increase traffic flows on several roads within the National Park. Specifically, it will: -

- i) Increase traffic on the A628(T) by 950 vehicles (2025) and 1,100 vehicles (2040)
- ii) Increase traffic on the A57 Snake Pass by 1,150 vehicles (2025) and 1,450 vehicles (2040)
- iii) Increase traffic on the A6024 Holme Moss road by 100 vehicles (2025) and 50 vehicles (2040)

Table 7.4 – Comparison of Current situation with Do minimum and Do something (2025 and 2040) – All vehicles

| Road | Location | Opening Year (2025) | | | | Design Year (2040) | | | |
|-------------------|------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|
| | | AADT 2025 (Do minimum) | AADT 2025 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM | AADT 2040 (Do minimum) | AADT 2040 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM |
| A628(T) | Crowden | 10,700 | 11,650 | +950 | +8.9% | 11,100 | 12,200 | +1,100 | +9.9% |
| A628(T) | Woodhead | 13,100 | 14,000 | +900 | +6.9% | 14,700 | 15,650 | +950 | +6.5% |
| A628(T) | Salter’s Brook | 12,400 | 13,250 | +850 | +6.9% | 13,800 | 14,700 | +900 | +6.5% |
| A57 Snake Pass | East of Hurst Rd | 3,050 | 4,200 | +1,150 | +37.7% | 3,850 | 5,300 | +1,450 | +37.7% |
| A624 | Gnathole | 9,650 | 9,550 | -100 | -1.0% | 12,450 | 11,850 | -600 | -4.8% |
| A6024 Holme Moss | Heyden Bridge | 700 | 800 | +100 | +14.3% | 900 | 950 | +50 | +5.6% |
| B6015 Woodhead Rd | Torside | 2,400 | 2,350 | -50 | -2.1% | 3,650 | 3,450 | -200 | -5.5% |
| Monks’ Road | Unknown | n/a | n/a | +241 | n/a | n/a | n/a | +654 | n/a |

Table 7.4 – Comparison of Current situation with Do minimum and Do something (2025 and 2040) – HGVs

| Road | Location | Opening Year (2025) | | | | Design Year (2040) | | | |
|-------------------|------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|
| | | AADT 2025 (Do minimum) | AADT 2025 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM | AADT 2040 (Do minimum) | AADT 2040 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM |
| A628(T) | Crowden | 1,605 | 1,631 | +26 | +1.6% | 1,433 | 1,586 | +153 | +10.7% |
| A628(T) | Woodhead | 1,703 | 1,820 | +117 | +6.9% | 1,617 | 1,722 | +105 | +6.5% |
| A628(T) | Salter’s Brook | 1,736 | 1,723 | -13 | -0.8% | 1,656 | 1,764 | +108 | +6.5% |
| A57 Snake Pass | East of Hurst Rd | 31 | 42 | +11 | +35.5% | 39 | 53 | +14 | +35.9% |
| A624 | Gnathole | 290 | 382 | +92 | +31.7% | 374 | 474 | +100 | +26.7% |
| A6024 Holme Moss | Heyden Bridge | 0 | 0 | 0 | 0.00% | 0 | 0 | 0 | 0.00% |
| B6015 Woodhead Rd | Torside | 120 | 118 | -2 | -1.7% | 183 | 138 | -45 | -24.6% |
| Monks’ Road | Unknown | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

- iv) Increase traffic on Monks' Road by 241 vehicles (2025) and 654 vehicles (2040)

7.2.14 The scheme does lead to a decrease in traffic flows on two National Park roads, specifically there is a: -

- i) Decrease in traffic on the A624 Glossop to Chapel Milton road of 100 vehicles (2025) and 600 vehicles (2040); however, this is offset by the increase in flows on Monks Road
- ii) Decrease in traffic on the B6015 Woodhead Road Milton of 50 vehicles (2025) and 200 vehicles (2040).

8. Local Impacts

8.1 Introduction

- 8.1.1 The Peak District National Park Authority recognises the aims of the A57 Link Roads scheme to improve conditions for the residents of Mottram Moor and Woolley Bridge, and also for those who visit these areas to access employment, education and other services.
- 8.1.2 The Peak District National Park is located to the east of the proposed scheme. As such, none of the proposed works have a direct impact on the National Park. However, the Environmental Statement accompanying the DCO submission for the scheme raises concerns for the Authority with regard to the indirect effects of the scheme on the National Park. In all cases, these effects are related to increased traffic flows on National Park roads, principally the A628 Woodhead and A57 Snake Passes.
- 8.1.3 The A628 Woodhead route across the National Park is predicted to experience a daily increase in traffic of up to 950 vehicles (2025) and 1,100 vehicles (2040); whilst the A57 Snake Pass will see an increase in vehicles of 1,150 (2025) and 1,450 (2040).
- 8.1.4 This growth in traffic has the potential to negatively affect the Special Qualities of the Peak District, whilst impacting on the achievement of the Statutory Purposes of the National Park (Section 61, Environment Act, 1995). The National Park Authority has concerns regarding the effects of the scheme on the following topic areas.

8.2 Concerns about the Landscape assessment methodology

- 8.2.1 Officers of the Peak District National Park Authority have raised concerns with the scheme promoters in relation to how some impacts on the National Park have been assessed. In effect this relates to indirect impacts, which have largely been judged to be insignificant. However, given the national importance of the National Park and its landscape and special qualities, we wish to raise the following concerns.
- 8.2.2 The A57 Link Roads scheme lies approximately 2km away from the boundary of the Peak District National Park at its nearest point. Therefore, the landscape and visual effects of the scheme on the National Park would be indirect, not direct.
- 8.2.3 Therefore it is important that the methodology for considering the indirect effects of the scheme is appropriate. In the case of the National Park, the main effect is the indirect impact of increased vehicles on existing roads across the Park. Of additional concern is that increased vehicle numbers will act as a driver for additional demand for increased capacity on these roads and/or associated infrastructure upgrades (signage, lighting, straightening, widening; or for other schemes to cope with the safety impact of additional traffic on unsuitable routes
- 8.2.4 The Peak District National Park Authority and natural England were engaged in discussions with Highways England and Arcadis about the methodology for determining indirect effects of the scheme. However, since the decoupling of the A57 Links Roads scheme from the Trans Pennine Upgrade Programme in 2019 these discussions do not appear to have been considered pertinent by the current consultant.

Effect Significance

- 8.2.5 In terms of the scheme promoter's assessment methodology, they defined significance categories (in Table 4.1 and 4.2 – and again in Table 7.13) and state *'slight effects are not considered material in the decision-making process'*. We believe that this statement is contrary to national planning policies. Paragraph 176 of the National Planning Policy Framework (2021) states: -

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas"

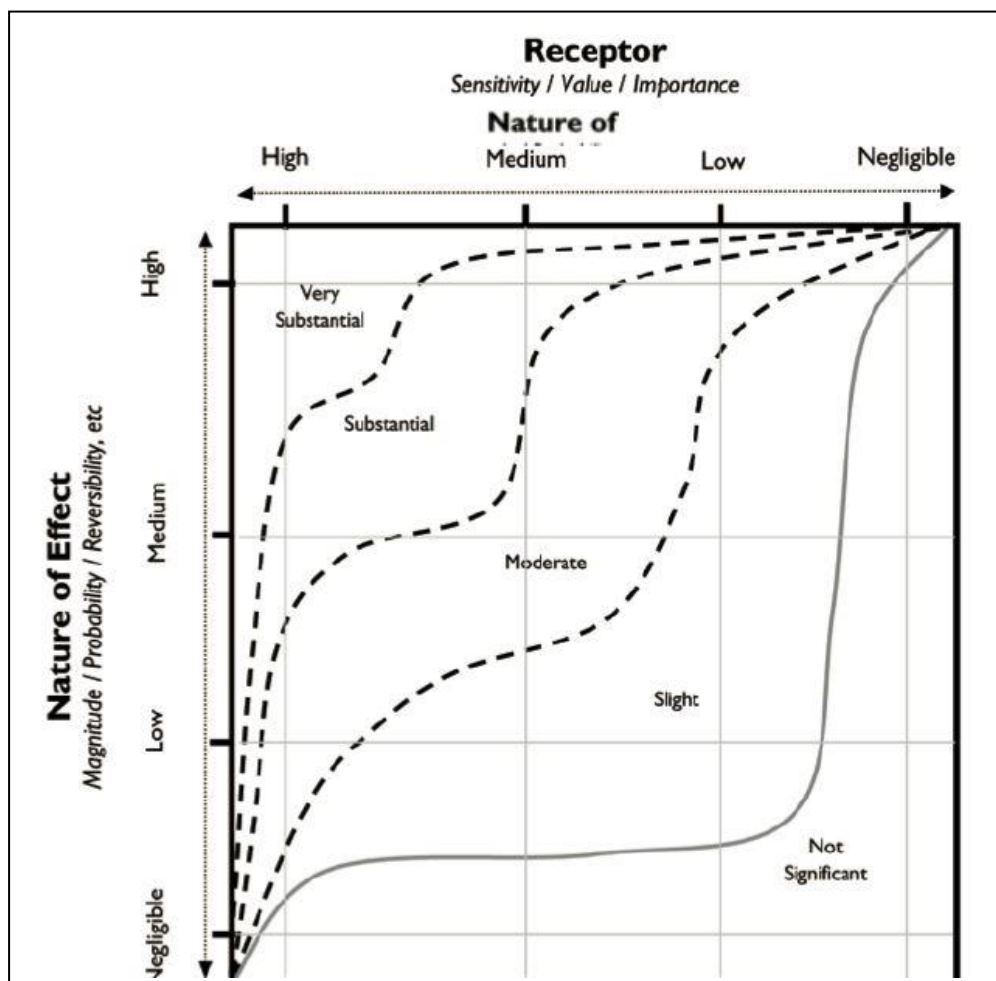
- 8.2.6 Paragraph 177 of the National Planning Policy Framework (2021) goes on to state: -

"When considering applications for development within National Parks... permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated'*

- 8.2.7 It is worth noting that neither of aforementioned paragraphs from the National Planning Policy Framework (2021) is referenced within the 'Landscape Legislation and Policy' section in Chapter 7 of the Environmental Statement.
- 8.2.8 In addition, this approach does not accord with good assessment practice; the Institute of Environmental Assessments table (below 8.1) is taken from 'The state of Environmental Assessment Practice' (IEMA, 2011) and clearly shows that effects of even slight/low magnitude have the potential to result in substantial effects on sensitive receptors.

Table 8.1 – EIA significance evaluation matrix



8.2.9 Peak District National Park Core Policy L1: Landscape character and valued characteristics states that “*Development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan, and other valued characteristics*”. Whilst the development in question does not take place within the National Park, the effects of increased traffic flow are felt within the National Park. We believe that effects which are slight adverse (or even negligible) do not conform with Policy L1 by ‘conserving and enhancing’. Effects of this magnitude should therefore be considered a material consideration in the decision-making process where the effects are within National Parks.

How are indirect effects (on the Landscape and visual amenity of the NP) considered and assessed within the LVIA?

Identification of the Baseline

8.2.10 We believe that a more detailed area of landscape indirectly affected by the development be identified (rather than the entire LCT areas). This is because the effects of increased traffic flow are likely to be relatively localised. The Environmental Statement states that ‘*a scheme level landscape character assessment has been undertaken (Figure 7.3)*’ (Chap 7, p.15), but this fails to address the issue. This is because the ‘scheme level’ landscape character areas are all outside the Park boundary, rather than including areas within the Park.

- 8.2.11 Therefore, we do not believe that the appropriate landscape receptors have been adequately defined at the correct level of detail to determine indirect landscape effects of the scheme (on character and perceptual aspects such as tranquillity, wildness, remoteness etc) within the Park.
- 8.2.12 The scheme promoters have assured officers of the National Park Authority that specific perceptual aspects (tranquillity / wildness / scenic beauty) have been assessed as part of the '*consideration of the Special qualities of the Park*'. Whilst the defined special qualities are important, these do not specifically address the perceptual issues important to landscape character. We consider this to be a significant omission by the LVIA in terms of methodology and does not satisfactorily address the issues raised during the consultation process.

Methodology for determining Indirect effects

- 8.2.13 Following on from this, the LVIA states (p.22 para 7.3.32): -

"DMRB LA 107 does not define a specific methodology for indirect landscape or visual assessment. Therefore, a methodology for this type of assessment has been agreed with stakeholders to consider indirect landscape and visual effects experienced within the Peak District National Park as a result of potential increased traffic flows through the National Park"

- 8.2.14 We do not consider that an adequate methodology has been put forward by the Applicant. We commented on their approach but we do not feel that this has been agreed prior to the submission of the ES. (However, that being said, their approach as outlined in sections 7.3.8 – 7.3.44 is acceptable as far as it goes).
- 8.2.15 Paragraph 7.3.45 of the Environmental Statement states "*Professional judgement was used to determine the magnitude of change*". Whilst this acceptable in principle, it does not go far enough: this is the crux of the issue; how is the magnitude of effect (of changing vehicle numbers) determined? The Environmental Statement does not state the factors that have been used/considered to judge this effect.
- 8.2.16 Paragraph 7.5.9 of the Environmental Statement states "*The assessment of indirect visual effects within the Peak District National Park is as per methodology agreed with the stakeholders, as detailed within section 7.3*". Officers of the National Park Authority do not believe that a methodology was agreed. For example, we specifically requested that more detailed landscape receptor areas were identified, this was not undertaken.
- 8.2.17 Paragraph 7.9.16 of the Environmental Statement takes information from the Noise and Vibration section of the Environmental Statement. In previous discussions between the Officers of the National Park Authority and Natural England the case was firmly made that it was not acceptable to use noise levels as a 'proxy' for landscape or visual effects.

Assessment of Indirect effects on the National Park

- 8.2.18 Environmental Statement Table 7.29 Indirect effects on landscape character areas within the PDNP indicates a "*Slight adverse significance of change is defined for the Moorland Slopes and Cloughs, Reservoir Valleys with Woodlands and Open Moors LCTs*". We believe that: -

- The magnitude of change is poorly defined (see comments above re. para 7.3.45). It is unclear what reasoning or factors have been considered when coming to the 'professional judgement'.
- We would suggest that a higher magnitude of change would be identified if a more detailed local character area were assessed.
- In the methodology employed, 'slight adverse' effects are not considered to be material. We would disagree and state that slight adverse effects are a material consideration when applied to a highly sensitive National Park landscape (see Table 8.1 above).

8.2.19 Within Environmental Statement Table 7.32 Indirect visual effects on representative viewpoints within the PDNP, 'No change' is consistently identified for the magnitude of change. The Environmental Statement acknowledges that vehicle numbers will increase. It is difficult to equate a large increase in vehicles with a 'no change' judgement. The Environmental Statement offer no justification for the assessment of 'no change'. Change may well be of a low magnitude, but there is still clearly a degree of adverse change (which has not been taken into account within the assessment process).

8.2.20 In our view, the change in vehicle numbers would be apparent, though magnitude is likely to be negligible. However, given the sensitivity of the visual receptors, this would likely result in a slight adverse significance of effect based on the methodology used. Within a National Park, we believe this effect is a material consideration.

8.2.21 We believe that there are a number of issues in the ES and LVIA methodology. The issue of 'slight adverse' effects not being a material consideration in a National Park is one of them. We also believe that indirect visual effects are under assessed.

8.3 Air Quality

Tintwistle AQMA

8.3.1 The Tintwistle Air Quality Management Area (AQMA) is acknowledged within the Environmental Statement Chapter 5 (paragraph 5.6.2, Table 5-4 and Figure 5.1. However, paragraph 5.6.2 makes it clear that the Tintwistle AQMA falls outside the criteria of the Affected Road Network (as defined within DMRB LA105). In effect, the predicted increase in traffic on the A628 through Tintwistle is predicted to be 50 vehicles per day below the 1,000 vehicle AADT increase required for the AQMA to meet this criterion.

8.3.2 Table 6.1 provides nitrous oxide data recorded at two air quality monitoring sites within the Tintwistle AQMA. One of these HP2a was a temporary site, whilst HP5 is a permanent site. HP5 suggests an overall downward trend in annual mean nitrous oxide emissions from 50.2 µg/m³ in 2014 to 47.0 µg/m³ in 2018. However, it should be noted that this is not a continuous downward trend with the counter recording peaks of 51.8 µg/m³ in 2015 and 50.9 µg/m³ in 2017.

8.3.3 Figure 5.1 of Chapter 5 of the ES shows the Tintwistle AQMA, but does not give any indication of the effects of the scheme on the Tintwistle AQMA. Whilst the HP5 monitoring site was indication a downward trend in nitrous oxides prior to the Covid-19 pandemic, it is unclear how locked in this trend is.

- 8.3.4 Traffic modelling indicates that there will be an increase in traffic of 950 vehicles per day (AADT) as a result of the A57 Links Road scheme in 2025. It should be noted that this is unlikely to represent a uniform flow throughout the day. Whilst the effects of Covid-19 are still to be fully understood, it is still likely that there will be morning and evening peak flows of traffic and associated congestion.
- 8.3.5 Overall, traffic levels through Tintwistle are predicted to be even higher in the Design Year (2040) with the scheme at 12,200 AADT (an increase of 1,100 over the 'Do Minimum' scenario'.
- 8.3.6 Even allowing for a general improvement in emissions across the region's vehicle fleet over time, it is likely that nitrogen dioxide and particulate matter emissions³⁶ will remain problematic in the opening year of the scheme and beyond.
- 8.3.7 It is difficult to accurately assess what the possible impact of the scheme on the Tintwistle AQMA will be because it lies outside of the ARN and as such is not covered within the Environmental Statement.

Designated sites

- 8.3.8 The Environmental Statement does assess the possible impact of the air quality impacts of increased traffic flows on the A57 Snake Pass on the South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI. The predicted increase in traffic flows is 1,150 AADT in 2025 with the scheme compared to the 'Do Minimum'. Whilst this is a significant increase in traffic, the actual totals are lower than on the A628 Trunk Road, which also crosses the National Park through the South Pennine Moors SAC, Peak District Moors SPA and the Dark Peak SSSI.
- 8.3.9 In assessing the impact on the designated sites adjacent to the A57 Snake Pass, Paragraph 5.7.34 states that
- "The change in nitrogen deposition rates with the Scheme are less than the DMRB LA 105 designated habitat screening criteria and the magnitude of change of the nitrogen deposition is less than 0.4 kg N/ha/yr at all relevant statutory designated sites."*
- 8.3.9 For the A628 Trunk Road across the National Park, the appropriate traffic flow figures are taken from the modelled traffic flows east of Woodhead Station, where the route passes through the SAC, SPA and SSSI. At this location traffic flow is predicted to increase by 850 vehicles AADT in 2025 with the scheme compared with the 'Do Minimum'. However, in comparison to the A57 Snake Pass, this is an increase of 850 vehicle on top of predicted flows of 12,400 vehicles AADT 'Do Minimum'.
- 8.3.10 The predicted increase in traffic flow at Salters Brook on the A628(T) is only 7% (2025 'Do Something'). However, unlike the A57 Snake Pass, a high proportion of the total number of vehicles is HGV traffic (1,723 AADT), with a bias towards diesel engines which produce greater amounts of nitrous oxides.
- 8.3.11 Unfortunately the relatively small predicted increase in vehicles along the A628 means that an assessment of impact on the SAC, SPA and SSSI have been scoped out as the road is not part of the ARN.

³⁶ Even with the general electrification of the fleet, particulate matter will continue to be generated by the wear of tyres and brake pads; as well as the general erosion of the road surface.

8.3.12 Figure 6.2 of this report shows that existing levels of nitrogen dioxide emissions are relatively high along the A628 corridor at 1 - 25-unit tonnes of NO₂ per km³⁷; whilst those along the A57 Snake Pass are lower 0.3 - 1-unit tonnes of NO₂ per km. Given the existing high levels of nitrous oxide emissions along the A628 Trunk Road. We believe that the impacts of the scheme on the SAC, SPA and SSSI adjacent to the A628(T) should have been fully assessed.

8.4 Cultural Heritage

Assets in scope

8.4.1 For the development of the Environmental Statement, a 500km search area was used for non-designated assets, and 1km for designated assets. The baseline was reassessed for heritage assets between 1-2km from the development, using the ZTV. From this, and following consultation, Chapter 6 now includes consideration of Tintwistle Conservation Area, which is welcomed.

8.4.2 The Environmental Statement states *'It is considered that beyond the 2 km study area the Scheme would not be readily perceptible'* (para 6.5.3 and also 7.5.6). The lack of longer-distance views (and more distant heritage assets) was a point raised by officers of the National Park Authority previously. We had proposed consideration of heritage assets south of Simmondley, east of Charlesworth and views from Peak Naze, east of Padfield but these have not been included. Presumably, they were considered to be out of scope.

Physical impacts on heritage

8.4.3 Physical impact to heritage assets (known and unknown) will lie wholly outside the national park. This is being dealt with by the relevant Local Authorities and a mitigation strategy will be in place.

Visual impact on heritage

8.4.4 Tintwistle Conservation Area and its assets fall outside of the 1km zone and off of the map. Therefore, it is difficult to assess if they would be visually impacted.

Setting and indirect impact on heritage

8.4.5 The key impacts on heritage in the National Park are indirect, and arise from increased traffic flows. There will a slight increase (8.9%) in traffic through the Tintwistle Conservation Area (2025) over the Do Minimum scenario, which the Environmental Statement authors have judged to have a 'non-significant, neutral, residual effect'. This will, nonetheless, have an adverse effect on how the Conservation Area is experienced. It should be noted that by the Design Year (2025), the percentage increase in flows for the 'Do Something' over the 'Do Minimum' is 9.9%; an increase in AADT of 1,100 vehicles (including 1,586 HGVs). This means that the impact of the scheme on the Tintwistle Conservation Area will increase over time.

8.4.6 The percentage increase in flow on the A57 Snake Pass in 2025 with the scheme seems to be very large (37.7%) but the Environmental Statement (Table 7.32) only notes a 'slight increase' of traffic on the A57 (e.g. in relation to VP23) with no change

³⁷ Figure 6.2 is a screen print from the BEIS UK emissions interactive map for road related nitrogen dioxide emissions [UK Emissions Interactive Map \(beis.gov.uk\)](https://beis.gov.uk)

to the Special Qualities of the National Park. We are concerned that the assessment of impact of increased traffic on the A57 is underestimated. The A57 does not run through any Conservation Areas, but heritage assets are one part of the major attractions for people to the Ladybower Reservoir area.

- 8.4.7 Within the National Park, the A57 falls in the setting of a significant cluster of scheduled monuments that run along Hordron Edge, Bamford Edge, Crook Hill and Bridgend Pasture. The increased traffic flow could impact adversely on the enjoyment and experience of these important landscapes. As noted in Table 7.8 'the presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right'. These receptors have not been identified within Chapter 6 or Chapter 7 of the Environmental Statement, as being indirectly affected by the scheme.
- 8.4.8 It should be noted that whilst the 20240 Design Year increase in flows of the 'Do Something' over the 'Do Minimum' for the A57 Snake Pass remains at 37.7%; in effect this is an increase in the AADT of 1,450 additional vehicles.
- 8.4.9 In sum, the effects on heritage in the National Park are indirect, and relatively small-scale, mainly relating to increases in traffic movement. This will affect how people experience the historic built environment (Tintwistle Conservation Area) and heritage features in the upland rural environment. These heritage assets are bound up closely with other landscape characteristics that contribute to several of the Park's Special Qualities.
- 8.4.10 Generally, we were disappointed that no opportunities for the enhancement of the historic environment could be identified within Environmental Statement paragraph 6.10.4.

8.5 Landscape and visual

- 8.5.1 We are concerned with how the indirect landscape impacts (increased traffic flow) of the scheme have been assessed. National Policy sets great store in ensuring the road schemes and their effects are thoroughly assessed to avoid or minimise impacts on National Parks. We do not believe that appropriate landscape receptors have been adequately defined at the correct level of detail to determine indirect landscape effects of the scheme (on character and perceptual aspects such as tranquillity, wildness, remoteness etc) within the National Park.
- 8.5.2 We are concerned that where negative impacts have been recognised, 'slight adverse' effects are not considered to be material. In the case of a protected landscape we believe that slight adverse effects are a material consideration. This is particularly pertinent due to the cumulative harm caused by additional traffic loads on top of the existing high levels of traffic through these valleys.

8.6 Biodiversity

- 8.6.1 We are concerned that increases in air pollution, notably Nitrogen deposition, and the impact of this on Blanket Bog and Upland Heathland habitats within the South Pennine Moors SAC. I note that this potential impact has been scoped out in the Habitats Regulations Assessment as having no likely significant effects on the basis that the predicted traffic increases are below the threshold of 1000 AADT; however, some of the figures are very close to the 1000 AADT figure and we would question

what the confidence limits are for those figures. Should the confidence limits mean that the figures could exceed the 1000 AADT threshold, and notwithstanding the predicted improvements in quality of vehicle emissions, then we would suggest that the potential Nitrogen deposition impact should be factored in as a potential impact warranting further consideration as part of an Appropriate Assessment.

- 8.6.2 We are concerned about the increases in visual and noise disturbance to breeding moorland birds; both the SPA-qualifying species (Short-eared Owl, Merlin, Golden Plover) and the wider range of birds for which the Dark Peak SSSI qualifies, such as Curlew, Snipe and Dunlin. There may also be similar impacts on Mountain Hare- a species of Principal Importance in England and for which the Peak District population is the sole English population. These potential disturbance effects have been scoped out of further consideration on the basis that the roads are already busy. However, no evidence appears to be presented to substantiate that conclusion.
- 8.6.3 There is research evidence to suggest that both visual and noise disturbance can impact negatively on breeding birds, with some studies suggesting that there may be thresholds of tolerance by different species. No evidence appears to be presented to consider what disturbance thresholds might be relevant to the species concerned; whether the existing levels of disturbance already exceed those tolerances; or whether the predicted traffic increases might push the disturbance levels above key tolerance thresholds. This is particularly the case for the A57 where significant traffic increases of 38% are predicted.
- 8.6.3 We are also concerned about the increase in fire risk associated with higher traffic flows. This has not been scoped into potential factors having a significant effect; however, between 2007-2016 there were 260 recorded wildfires on the Peak District moors. Only 28 of these had causes attributed, of which 1 was specifically attributable to a vehicle and a further 6-7 attributable to discarded cigarettes, a proportion of which may arise from vehicles on roads traversing the moors. So, it is likely that at least 1 wildfire per year on the Peak District moors is attributable to vehicle use. Any increase in traffic volumes; particularly as large as the 38% predicted increase on the A57, is likely to increase the risk of wildfire. We would therefore suggest that the assessment of increased wildfire risk has wrongly been scoped out of having a potential significant impact on Blanket Bog and Upland Heathland habitat in the SAC.

8.7 Noise and vibration

Tintwistle

- 8.7.1 Tintwistle is a settlement located on the western edge of the Peak District National Park. The village is divided east and west by the National Park boundary, with the eastern half of the village falling inside the National Park. The A628 Trunk road passes through the village of Tintwistle.
- 8.7.2 The A628 carries large numbers of vehicles through Tintwistle. The traffic modelling indicates that with the scheme in 2025, there will be 11,650 vehicles passing through Tintwistle (950 vehicles more than in the 'Do Minimum' scenario). HGVs make up 14% of this total (1,631).
- 8.7.3 This high level of traffic and the percentage of HGVs will have a negative effect on residents of the village of Tintwistle. This will be particularly acute for those

properties adjacent to the road and where vehicles are climbing eastwards out of the village. The pedestrians and equestrian crossings within the village, necessary to allow crossing of the A628 exacerbate the situation as motor vehicles are generally noisier in low gears and accelerating; this is particularly the case for diesel engine HGVs.

- 8.7.4 Whilst it is difficult to predict the effects of the move towards decarbonising road transport on noise impacts; it should be noted that with the scheme the Design Year (2040) predictions are for a 12,200 vehicle AADT (an increase of 1,100 over the 'Do Minimum' scenario'. This is predicted to include 1,586 HGVs per day.

Effects on designated sites

- 8.7.5 We are concerned about the increases in visual and noise disturbance to breeding moorland birds; both the SPA-qualifying species (Short-eared Owl, Merlin, Golden Plover) and the wider range of birds for which the Dark Peak SSSI qualifies, such as Curlew, Snipe and Dunlin. There may also be similar impacts on Mountain Hare- a species of Principal Importance in England and for which the Peak District population is the sole English population.

Effects on the quiet enjoyment of the National Park

- 8.7.6 Section 6.5 describes the effect of current traffic levels on the quiet enjoyment of the National Park. For users of the high moorland stretch of the Longdendale / Trans Pennine Trail; the noise of traffic on the A628 approaching Longside is audible before the road itself is visible.
- 8.7.7 Similarly, whilst the A628 is separated from users of the lower section of the Trans Pennine Trail by the width of the valley and the Longdendale valley reservoirs, the road is still audible; albeit as a distant rumble.
- 8.7.8 Visitors to the high gritstone edges that parallel the A57 Snake Pass are reminded of the presence of an often not visible road by the sound of traffic. This is particularly the case at weekends when high-revving motorcycle engines often obscure the sounds of birdsong, the breeze or the trickle of water in the cloughs.
- 8.7.9 Given the existing levels of noise disturbance for visitors to the National Park as described above, it is likely that this nuisance will become worse. For users of the Trans Pennine / Longdendale Trail adjacent to the A628, traffic noise is already a fairly constant intrusion. The addition of between 850 and 950 additional vehicles per day (2025 Do Something') is likely to reduce the number or length of quieter periods.
- 8.7.10 For the A57 Snake Pass, the increase in vehicles is more pronounced (1,150 or 38%) with the scheme (2025). It is likely that this will have a more noticeable effect for visitors to the National Park.

8.8 Population and health

Tintwistle

- 8.8.1 Tintwistle is a settlement located on the western edge of the Peak District National Park. The village is divided east and west by the National Park boundary, with the eastern half of the village falling inside the National Park. The A628 Trunk road passes through the village of Tintwistle. Tintwistle lies to the east of the A57 Link

Roads scheme and is the easternmost of the three Longdendale villages; with the others being Mottram and Hollingworth.

- 8.8.2 The A628 carries large numbers of vehicles through Tintwistle. The traffic modelling indicates that with the scheme in 2025, there will be 11,650 vehicles passing through Tintwistle (950 vehicles more than in the 'Do Minimum' scenario). HGVs make up 14% of this total (1,631). However, with the scheme; by the Design Year (2040) there are predicted to be 12,200 vehicles per day (an increase of 1,100 over the 'Do Minimum' scenario'. This is predicted to include 1,586 HGVs per day.
- 8.8.3 The increase in traffic flows as a result of the scheme are likely to affect the Tintwistle Air Quality Management Area as described in Section 8.3. They are also likely to increase noise and vibration as detailed in Section 8.7.
- 8.8.4 The increase in traffic flows is also likely to increase severance through the village making crossing of the road more difficult. It is also likely to affect the resident's propensity to cycle or to walk for journeys that necessitate either crossing the road or utilising narrow sections of pavement adjacent to the A628.

Severance

- 8.8.5 As described in Section 6.6 and shown in Figure 6.8, there is an extensive rights of way network across the Dark Peak Area of the Peak District National Park. In addition to footpaths and bridleways, the area is crossed by a number of nationally important routes – the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail. These routes cross both the A628 Trunk Roads and the A57 Snake Pass within the National Park. The principle crossing points are: -
- The A628 Trunk Road
 - The Pennine Bridleway crossing point at the eastern edge of Tintwistle
 - The Pennine Way crossing at Torside
 - The Longdendale / Trans Pennine Trail crossings at Woodhead Station, Longside End and Carr Bottom
 - The A57 Snake Pass
 - The Pennine Way crossing at Snake Summit
- 8.8.6 These and other crossing points on the A628 and A57 in particular can already be difficult to use due to existing levels of traffic. Users of these routes are also exposed to traffic noise, dust and vehicle fumes when using, or waiting to use these crossing points.
- 8.8.7 Both the A628(T) and A57 Snake Pass are predicted to see increased traffic flows as a result of the scheme compared with the 'Do Minimum Scenario'. For those crossing these roads, the increase in traffic flows will make these crossings even more difficult. Table 8.2 shows the predicted traffic flows at each of the crossing points described above both with and without the scheme.
- 8.8.8 The Peak District National Park is a popular destination for road cyclists. The Holme Moss and Snake Pass Routes include popular hill climbs, which are linked via the A628 (T). The increase in traffic on all three roads, but particularly the A628(T) and A57 Snake Pass are likely to act as a deterrent to cyclists. It is acknowledged that concerns about road safety strongly influence the public's propensity to cycle.

Table 8.2 – Predicted traffic flows past key walking and cycling routes affected by the A57 Link Roads Scheme

| Crossing Point | AADT Opening Year (2025) | | AADT Design Year (2040) | |
|---|--------------------------|-------------|-------------------------|-------------|
| | Without scheme | With scheme | Without scheme | With scheme |
| A628 (T) Pennine Bridleway - eastern edge of Tintwistle | 10,700 | 11,650 | 11,100 | 12,200 |
| A628 (T) Pennine Way crossing at Torside | 10,700 | 11,650 | 11,100 | 12,200 |
| A628 (T) Longdendale / Trans Pennine Trail crossing at Woodhead Station | 12,400 | 13,250 | 13,800 | 14,700 |
| A628 (T) Longdendale / Trans Pennine Trail crossing at Longside End | 12,400 | 13,250 | 13,800 | 14,700 |
| A628 (T) Longdendale / Trans Pennine Trail crossing at Carr Bottom | 12,400 | 13,250 | 13,800 | 14,700 |
| A57 Snake Pass Pennine Way crossing at Snake Summit | 3,050 | 4,200 | 3,850 | 5,300 |

- 8.8.9 The A628(T) does have an alternative off-road route for those who don't wish to use the road in the Trans Pennine / Longdendale Trails. However, the A57 has no such route and is set to experience a dramatic increase in vehicles. It is likely that this will affect people's decisions on cycling on the road.

Road Safety

- 8.9.10 Section 6.6 and Figures 6.9 to 6.11 set out the current situation in relation to road safety on Peak District roads affected by the scheme. The Road Safety Foundation European Road Assessment Programme (EuroRAP) describes the A57 Snake Pass as a "*persistently high-risk road*"³⁸.
- 8.9.11 Paragraph 7.2.13 of the Transport Assessment acknowledges the current high accident rate on the A57 Snake Pass. It goes on to state that the increase in traffic flows as a result of the scheme is likely to increase the number of accidents by: -
- "more than 160 over the 60-year appraisal period, as a result of increased flows in the DS scenario."*³⁹
- 8.9.12 Paragraph 7.2.13 goes on to state that: -
- "Small increases in accidents are also expected through Glossop and along the rural sections of the A628 east of Tintwistle."*
- 8.9.13 We recognise that the levels of risk ascribed to both the A628(T) and the A57 Snake Pass do not themselves change, the higher levels of traffic flow make accidents more

³⁸ <http://rsfmaps.agilysis.co.uk/>

³⁹ A57 Link Roads TR010034 7.4 Transport Assessment Report

likely to occur. In the case of the A628, the Transport Assessment indicates that traffic is being rerouted on to the A628 from the M62 as a result of the scheme. Given the inherent safety benefits of motorways over rural trunk roads, this would appear to be a negative effect of the scheme, particularly if it increases the risk of collision on the A628.

- 8.9.14 The overall suggested negative impact on road safety for Peak District roads is a grave concern. Given the geography and topography of the roads in question, it is likely that such collisions are more likely to be severe than slight. The human cost of such events is devastating for those involved. It is also likely that any such increase in collisions will put pressure on the appropriate highway authority to undertake remedial works that may in turn negatively impact on the landscape of the National Park.
- 8.9.15 The documents accompanying the DCO application make it clear that in the case of the A57 Snake Pass, the responsibility for dealing with the expected increase in traffic will fall to Derbyshire County Council as the highway authority to deal with. As has already been noted, the A57 Snake Pass crosses open moorland amidst high level ecological designations. The delivery of sympathetic measures to address road safety concerns within this setting is likely to be both costly and bespoke. As the introduction of the A57 Link Roads scheme is likely to necessitate such measures, National Highways should contribute both funding and expertise to ensure that any measures accord with National Park purposes.

8.9 Climate

Context

- 8.9.1 The Climate Change Act 2008 as amended in 2019 commits the UK to reduce net carbon emissions to zero by 2050. However, emissions of greenhouse gases from surface transport have remained at consistent levels between 1990 and 2019 of approximately 110 MtCO₂ with no sign of long-term reduction⁴⁰.

Observations

- 8.9.2 The Environmental Statement contains detailed consideration of the physical effects of climate change on the planned road structure that appear robust and thorough. However, consideration of the schemes contribution to climate change is not analysed with an equivalent rigour. Paragraph 14.13.1 provides the following statement.

“The scheme is likely to contribute 116,332 tCO₂e to the UK’s Carbon Budgets across the period 2023-37, compared with the Do-Minimum scenario. The (net) contribution of the scheme to the fourth Carbon Budget period would be 55,253 tCO₂e (equivalent to 0.0028% of that budget), including construction and operational phase emissions. The contribution of the scheme to the fifth Carbon Budget would be 29,231 tCO₂e (equivalent to 0.0017% of that budget), from operational emissions. The contribution of the scheme to the sixth Carbon Budget would be 31,848 tCO₂e (equivalent to 0.0033% of that budget). It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. In this context, it is considered unlikely that this Scheme will in isolation conclude significant effects

⁴⁰ BEIS (2020) Provisional UK greenhouse gas emissions national statistics 2019

on climate. However, mitigation measures have been embedded into the Scheme design (Section 14.9) to reduce emissions as far as possible.”

- 8.9.3 This simplistic comparison is an inadequate assessment, as it is inevitable that almost all individual site or project-based greenhouse gas emissions will appear insignificant when compared to the National Carbon Budget and reduction targets. By extension, it also suggests that all individual GHG emissions can be ignored due to their relative scale when compared to National Targets; an approach which would not be considered acceptable in other areas of activity.
- 8.9.4 The summary suggests that the scheme in isolation is unlikely to produce significant effects on the climate. However, it should not be considered in isolation but as part of an accumulative process that is changing the climate and damaging the environment.
- 8.9.5 We believe that a more local assessment of impact should be undertaken to consider the emissions in relation to those who are likely to benefit from the scheme and the immediate area where its impact will be felt, would be more appropriate.
- 8.9.6 By way of example; the Updated Short-term Traded Carbon Values Used for UK public policy appraisal published April 2019 by BEIS suggest a carbon value in 2023 under their central figure assumptions of 33.94 £/tCO₂e. This would suggest the emissions associated with the scheme have a projected price/value of approximately £3,950,000. A more sophisticated assessment allowing for the tailpipe emissions over the full life of the scheme would produce a higher figure as the value of carbon reduction is expected to increase with time.
- 8.9.7 The government ‘s guidance states that assigning a value to carbon helps to ensure that such choices are made in a transparent fashion and in a way that seeks to be cost-effective for UK society as a whole. Valuing emissions impacts explicitly when making policy decisions helps to:
- ensure the climate impacts of policies are fully accounted for
 - ensure consistency in decision making across policies
 - improve transparency and scrutiny of decision making
- 8.9.8 This assessment of the mitigation costs associated with the carbon released by the scheme may in practice fall short of the real abatement costs but this does provide a starting point for consideration and should form part of the assessment. We would recommend that Highways England produce their own figures as part of the Environmental Statement.

8.10 Cumulative impacts

The Peak District National Park Authority recognises that our submission is focussed on the indirect impacts of the scheme on the National Park. We also appreciate that some of these impacts have been assessed as minor or insignificant within the ES. However, we are particularly concerned about the cumulative impacts of the scheme on the following: -

- a) **Tintwistle** – increased traffic flows through the village are likely to worsen air quality and noise & vibration; increase severance and effect experience of the Conservation Area.
- b) **Designated sites** – increased traffic flows are likely to increase nitrate deposition, noise disturbance, risk of wildfire and collisions with wildlife. It is of particular concern that the

effects of the increase in traffic on the A628 have not been assessed in relation to these impacts.

- c) **Quiet enjoyment** – increased traffic flow will affect both tranquillity and the quiet enjoyment of the landscape. It is also likely to negatively affect the use of important multi-user routes due to the increased difficulty of using crossing points.

Appendix A

A628 Site Visit in relation to the proposed Trans Pennine Upgrade Programme

September 2017

Photo 1 – Trail crossing of A628 above Woodhead Railway Station



Photo 2 – Looking south east from Trans Pennine Trail onto the A628 from Longside



Photo 3 – Looking east along Trans Pennine Trail towards the A628 Longside crossing



Photo 4 – Looking south east from Trans Pennine Trail towards crossing point warning signs



Photo 5 – Trans Pennine Trail Crossing point warning signs



Photo 6 – Trans Pennine Trail Crossing point at Longside End (looking eastwards)



Photo 7 – Looking west along the Trans Pennine Trail from the western side of the crossing



Photo 8 – Looking east along Trans Pennine Trail from eastern side of the crossing point



Photo 9 – Trans Pennine Trail crossing point from east to west



Photo 10 – looking westwards along the Trans Pennine Trail & A628



Photo 11 – Trans Pennine Trail user crossing A628



Photo 12 – looking westwards along the A628 from the Trans Pennine Trail at Longside



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Appendix 2 – Predicted changes in traffic flows as a result of the A57 Link Roads scheme

Table 1 – Comparison of Current situation with Do minimum and Do something (2025 and 2040) – All vehicles

| Road | Location | Opening Year (2025) | | | | Design Year (2040) | | | |
|-------------------|------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|
| | | AADT 2025 (Do minimum) | AADT 2025 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM | AADT 2040 (Do minimum) | AADT 2040 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM |
| A628(T) | Crowden | 10,700 | 11,650 | +950 | +8.9% | 11,100 | 12,200 | +1,100 | +9.9% |
| A628(T) | Woodhead | 13,100 | 14,000 | +900 | +6.9% | 14,700 | 15,650 | +950 | +6.5% |
| A628(T) | Salter's Brook | 12,400 | 13,250 | +850 | +6.9% | 13,800 | 14,700 | +900 | +6.5% |
| A57 Snake Pass | East of Hurst Rd | 3,050 | 4,200 | +1,150 | +37.7% | 3,850 | 5,300 | +1,450 | +37.7% |
| A624 | Gnathole | 9,650 | 9,550 | -100 | -1.0% | 12,450 | 11,850 | -600 | -4.8% |
| A6024 Holme Moss | Heyden Bridge | 700 | 800 | +100 | +14.3% | 900 | 950 | +50 | +5.6% |
| B6015 Woodhead Rd | Torside | 2,400 | 2,350 | -50 | -2.1% | 3,650 | 3,450 | -200 | -5.5% |
| Monks' Road | Unknown | n/a | n/a | +241 | n/a | n/a | n/a | +654 | n/a |

Table 2 – Comparison of Current situation with Do minimum and Do something (2025 and 2040) – HGVs

| Road | Location | Opening Year (2025) | | | | Design Year (2040) | | | |
|-------------------|------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|------------------------|-------------------------|------------------------------------|-------------------------------------|
| | | AADT 2025 (Do minimum) | AADT 2025 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM | AADT 2040 (Do minimum) | AADT 2040 (with scheme) | Numerical difference with DS to DM | Percentage difference with DS to DM |
| A628(T) | Crowden | 1,605 | 1,631 | +26 | +1.6% | 1,433 | 1,586 | +153 | +10.7% |
| A628(T) | Woodhead | 1,703 | 1,820 | +117 | +6.9% | 1,617 | 1,722 | +105 | +6.5% |
| A628(T) | Salter's Brook | 1,736 | 1,723 | -13 | -0.8% | 1,656 | 1,764 | +108 | +6.5% |
| A57 Snake Pass | East of Hurst Rd | 31 | 42 | +11 | +35.5% | 39 | 53 | +14 | +35.9% |
| A624 | Gnathole | 290 | 382 | +92 | +31.7% | 374 | 474 | +100 | +26.7% |
| A6024 Holme Moss | Heyden Bridge | 0 | 0 | 0 | 0.00% | 0 | 0 | 0 | 0.00% |
| B6015 Woodhead Rd | Torside | 120 | 118 | -2 | -1.7% | 183 | 138 | -45 | -24.6% |
| Monks' Road | Unknown | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

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