

Peak District National Park Authority

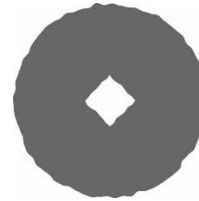
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Irene Ofei
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Highways England
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Your ref:

Our ref: TN/A810

Date: 7 April 2017

Dear Ms Ofei

Re: Trans-Pennine Upgrade Programme Non Statutory Public Consultation

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

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

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

Whilst the two purposes carry equal weight, if there is a conflict of purposes, the Sandford principle² places priority on the first purpose.

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

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



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

“Seek to foster the economic and social well-being of local communities within the National Park”³

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

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

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

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

Detailed Comments

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

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

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

i. Mottram Moor Link Road

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

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

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

ii. A57(T) to A57 Link Road

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

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

A61 Dualling

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

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

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

A628 Climbing Lanes

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

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

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

Location 1

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

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

Location 2

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

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

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

Safety Improvements

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

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

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

It should be noted that at the current time, speeding is not seen as a significant contributor to road traffic collisions on the A628 across the National Park⁴.

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

Technology Improvements

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

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

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

Yours sincerely

John Scott
Director of Conservation and Planning

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