

**AGENDA ITEM No. 8**

**PEAK DISTRICT NATIONAL PARK AUTHORITY**

**NATIONAL PARK AUTHORITY MEETING**

**30 MARCH 2007**

**CHIEF EXECUTIVE**

**PART A**

**1. RESPONSE TO THE A628 MOTTRAM - TINTWISTLE BYPASS 2007. (A811/SAT)**

**Proposal**

1. That the National Park Authority should object to the proposed construction of the A628 Mottram - Tintwistle Bypass as it stands for the following main reasons:

1. The objectives of the Scheme do not meet government guidance and that the overall aim, objectives and sub-objectives as set out are not sufficiently met.

2. The Scheme would have severe impacts on the National Park. The principle impacts being as follows:

- The predicted traffic growth and all the secondary impacts of this.
- The impacts on the landscape.
- The impacts on ecology.

**2. RECOMMENDATION:**

**That**

**1. The Authority objects to the proposed A57/A628 Mottram - Tintwistle Bypass and A628/A616 Route Restraint Measures as they currently stand.**

**2. The Authority registers this objection with the Highways Agency through the submission of the response listed in the Background Papers. Any final changes to this objection be delegated to the Director for Conservation and Development in consultation with the Member Representative for Transport.**

**3. The Authority issues a news release outlining its response and the reasons behind its decision.**

**Policy/Legal Background**

3. At the Authority Meeting in April 2006 Members resolved to object to the proposed A57/A628 Mottram – Tintwistle Bypass and A628/A616 Route Restraint Measures. Since then, the North West Regional Assembly has moved the funding programmed for the Scheme and Glossop Spur so that, if it were approved, the Bypass would not open until 2015. Due to the delay in funding and the number and significance of objections to the Scheme, the Highways Agency has revised the Environmental Statement and re-published the Draft Orders.

4. This report builds upon an initial briefing report on the revised Draft Orders that was presented to the Authority on March 9<sup>th</sup> 2007. In reaching their recommendations and producing the material presented in the annexes, officers have assessed whether the revised Scheme enables the Authority to reach a different set of conclusions and recommendations from those originally presented before Members in April 2006.
5. The principal aim of the Scheme is to provide relief from traffic congestion and HGV traffic to the villages of Mottram, Hollingworth and Tintwistle. The total length of the proposed Bypass is 5.7 km, described as the Main Study Area. Of this, 1.3 km lies within the National Park.
6. The Authority has always given an *in principle* support for a scheme that relieves the three villages from traffic congestion, this is reflected within the South Pennines Integrated Transport Strategy and inclusion within the Authority's Structure and Local Plan policies, namely; LT4: Safeguarding land for new road schemes and T5: New road schemes. The Authority has consistently applied this *in principle* support in all its policy making decisions since a scheme was first proposed. However, in reaching these decisions the Authority has always reserved the right to its own position on any proposed scheme once details of the environmental impacts upon the National Park have been published within the Draft Orders.

### **Key Issues**

7. The Bypass component to the Scheme remains the same as in the original draft Orders. However, a number of changes have been made to associated aspects, to take on board comments raised by objectors and subsequent instructions issued by the Secretary of State. These changes relate primarily to road safety and route restraint measures and are set out in the appendix of this report. The following paragraphs set out the key issues, in the same format as those reported to Members in April 2006. A more detailed analysis of these issues is set out in *Annex 1*.
8. Scheme Objectives  
Officers are extremely concerned that some of the Scheme objectives are not in line with current government guidance, as the objectives provided are for a road scheme rather than a transport solution to the specified problem in the villages of Mottram, Hollingworth and Tintwistle. The fact that some of the Scheme objectives do not appear to be in line with guidance leads officers to query some of the conclusions within the Draft Orders. In addition of equal importance, as Scheme objectives are for a road based scheme rather than a transport scheme, this leads officers to further query the adequacy of alternatives that have been assessed. As the objectives are biased towards a road scheme, it would be extremely difficult for any non-road scheme to be positively assessed. This heightens officers fears that the alternatives have not been adequately assessed.

Notwithstanding officers' concerns regarding the compatibility of the Scheme objectives with guidance, there are four main areas of concern regarding the Scheme's objectives.

- It is not possible to assess whether the Scheme has met its objective of minimising the impacts of the Scheme on the National Park, as officers do not feel that all alternatives have been sufficiently assessed.
- As alternatives have not been sufficiently assessed, it is questionable whether the Scheme sufficiently meets the first element of its overall aim which, is to reduce congestion in the villages. Figures indicate that the Scheme will only achieve a 7% and 17% reduction in traffic flows, compared with the 'do minimum' scenario, through Mottram and Hollingworth respectively by 2030. However, it is

acknowledged that the Scheme would significantly reduce HGV flows in all three villages, with reductions between 59% and 66% in 2030.

- One reason for the growth in traffic along the A628 is caused by transfer of traffic from the M62, and similarly, though to a lesser extent the A50. Traffic flows on the M62 are forecast to decrease by 1,400 vehicles per day in 2015 with the Scheme, which is a significant volume in relation to total flows on the A628. This runs contrary to the aim of deterring the transfer of traffic from other cross Pennine routes onto the A628 in the National Park.
- The South Pennines Integrated Transport Strategy (SPITS) was developed as a package of integrated measures to be implemented at the same time or soon after the development of any scheme. Although the Scheme fits one element of the SPITS strategy, namely improvements to the A57/A628/A616 core trunk road across the National Park, it conflicts with other core elements if as expected they are not implemented. The eight SPITS elements are outlined in the appendix to this report.

9. Scheme Alternatives

Officers are still concerned that alternatives to the Scheme have not been comprehensively assessed, as this section of the Environmental Statement remains the same for the 2006 Draft Orders.

It is not the role of the Authority to identify and detail a range of alternatives to the Scheme. However, officers have been working closely with Natural England to respond to a scoping document that details further alternatives that the Highways Agency will assess before the Public Inquiry. The alternatives within the scoping document are summarised in the appendix of this report.

Until these alternatives are given proper consideration using the same approach and methodologies for the Scheme, it is the view of officers that they cannot assess whether the Scheme is in line with certain policies, nor whether it is the most beneficial option in terms of meeting its objectives and minimising the impact on the National Park.

10. Sustainability of the Scheme

The Scheme would be operating almost at capacity in its opening year. There is no guarantee that the proposed route restraint measures would not be removed or changed without public consultation and/or that further measures be put in place to relieve the congestion caused by the Bypass. Any future measures to upgrade the corridor could have adverse impacts on the National Park and the designated SAC/SPA/SSSI areas.

Members should be aware that the Highways Agency is planning to provide officers with a copy of the Route Management Strategy for the A628 corridor, which it hopes will reduce concerns regarding sustainability. However, officers are not yet in receipt of this information and cannot therefore make any assurances in relation to it.

11. Plans and Policies

The Agency has given consideration to the Authority's original concerns regarding a lack of reference to National Park purposes, including brief reference to its Section 62 duties. The revised Environmental Statement acknowledges that the proposals at times complement our policy and at others conflict with it. A new section 'Consideration of the Special Nature of the Peak District National Park' states that the Bypass has been designed to minimise the impact on the National Park by:

- designing it with less capacity than a normal trunk road:
- providing additional mitigation in the form of cuttings and embankments to mitigate the visual intrusion: and

- provision of compensatory nature conservation habitat.

The policies listed below require a rigorous examination of all alternatives in advance of major development being permitted in the National Park. However, the lack of new information within the revised ES makes it impossible for officers to do this.

- GS1 – Development in the Peak National Park
- T3 – Cross-Park Traffic
- T5 – New Road Schemes
- LT4 – Safeguarding Land for New Road Schemes
- PPS7 – Sustainable Development in Rural Areas

12. Traffic Figures.

The traffic figures presented in the Scheme indicate that there will be a reduction in traffic flows within the village of Tintwistle by 63% in 2015 and 55% in 2030 compared to the 'do minimum' scenario, hence significantly reducing the current congestion problems. However, figures for the A628 east of Tintwistle are forecast to increase by 34% to 15,800 vehicles pa in 2015 and by 34% to 16,900 vehicles pa in 2030 compared to the 'do minimum' scenario.

Due to the complexity of traffic flows it is important to consider the net effect of the Scheme on traffic flows across the National Park. The Agency's assessment indicates an increase of annual average daily trips of 15% in 2015 (up to 29,200 vehicles pa) and a 16% increase in 2030 (up to 34,000 vehicles pa) within the modelled area of the Park. As with the previous Scheme much of this increase in growth is on the A6024. This increase is caused by drivers diverting from other roads (notably the M62), induced travel and longer journeys as a result of the Scheme.

As previously reported to Members it is these increased traffic flows have a bearing on the significance of the issues listed in the paragraphs below.

13. Landscape

There remain serious concerns over the impact upon the landscape of the National Park posed by the Scheme. The cumulative effect of proposed false cuttings, viaducts, embankments and roadside tree planting would also accentuate the linear characteristics of the road. The related impacts of noise, air and light pollution will also contribute to an overall negative effect on the landscape quality of the area. In addition, the Scheme raises several concerns with regard to the extra signage and traffic signals required in relation to the proposed route restraint and safety measures. It can also be argued that these measures would result in slow moving convoys of mainly HGV traffic along the A628 road through the upper Longdendale Valley and provide further visual intrusion within the National Park. The Agency itself makes the assessment that the visual impact of the proposed Bypass cannot be adequately mitigated.

14. Access and Recreation

Under its second purpose, the Authority has a duty to promote access and recreation to the National Park. The anticipated traffic figures still represent a significant obstacle in enabling pedestrians, cyclists and horse riders in gaining access to rights of way along the route. Most significant of these are the four national trails which cross the A628, importantly no additional safety measures have been incorporated into the Scheme to enable users to cross more safely other than signs, which in themselves have a visual impact. Increases in visual intrusion, noise and vibration will all reduce the attractiveness of the area and act as potential deterrents to recreation.

15. Air Quality

The figures for air quality assessment indicate limited impacts; however, there are a number of significant concerns over the methodology adopted. Firstly, the methodology used (as prescribed by the Highways Agency) is designed for assessing the impacts on the populations of urban areas, clearly, this is inappropriate for use within a national park. In addition, the assessments made incorporate predicted improvements in engine and fuel technologies; these are at present unknown and will be developed whether the scheme goes ahead or not. Finally, the figures are not modelled to 2025 as the traffic figures are, which only enables short term conclusions to be drawn.

16. Noise and Vibration

Under the Scheme the Agency has recognised that there will be increased noise impacts. However, the sampling receptors used in the modelling were located some distance from the A628 and hence may have given lower than anticipated figures for noise levels.

17. Ecology

Officers remain concerned about the infringement of the Scheme upon important moorland habitat. The net loss of approximately three hectares of heather / bilberry moorland (a UK Biodiversity Action Plan Priority habitat) at Holybank Quarry, fragmentation of the remainder and associated loss of localised invertebrate populations (including one candidate UK Biodiversity Action Plan Priority species) are of significant concern to the Authority. In addition, there are concerns about the impacts of the Scheme on bats (European Protected Species), which are likely to be affected by direct destruction of roosting sites and substantial areas of associated sheltered feeding areas. Proposed mitigation measures have been improved but are still considered inadequate. Further discussions are being held with Natural England on this issue.

Any pressure to further upgrade the A628 corridor would almost inevitably result in significant adverse impacts on the SAC/SPA/SSSI area.

18. Cultural Heritage

Since the 2006 Draft Orders, information regarding listed buildings and conservation areas within the relevant area of the National Park were supplied to the Highways Agency, and these have been noted in the revised Environmental Statement.

Officers are still concerned that the Scheme would have an adverse effect on the character of the Tintwistle conservation area in the National Park, and that the introduction of screening would change the character and appearance of the conservation area. Furthermore, officers are still awaiting discussions with the Highways Agency on a number of key issues surrounding the mitigation of archaeological sites that lie within the National Park.

19. Geology and Soils

The Authority no longer has significant concerns on aspects related to this issue.

20. Road Safety

Officers are concerned that the safety measures are incorporated into the Scheme. This concern is two fold; firstly, the Bypass is not expected to open until 2015, therefore officers suggest that some of these measures, if essential, could easily be implemented in advance of its opening. Some of the safety measures with the route restraint measures would act as a deterrent for some of the existing traffic using the A57/A628 corridor, and thus reduce congestion.

Secondly, the safety and route restraint measures are masking the significant adverse impacts of the Scheme. The 2007 Scheme appears to provide more benefits than the 2006 Scheme because the route restraint and safety measures are reducing the impacts on the National Park. Therefore, if these measures were implemented now, they would become part of the 'do minimum' scenario, and thus any further Environmental Statement for the Scheme would illustrate all impacts of the Scheme only on the National Park.

21. Members should be aware that with regard to some of the issues raised above, officers are having further discussions with the Agency to reach clarification and consensus. In these instances it is standard practice to develop a Memorandum of Understanding between the promoter and consultative body, which identifies areas of consensus and agreement. This has the benefit of providing evidence to the Inspector that the Authority has endeavoured to work closely and in co-operation with the Agency in resolving certain issues while enabling an objection to the Scheme to be submitted. This approach also saves time at the Inquiry.
  
22. The Scheme has generated considerable interest from local groups and individuals. At the time of writing this report, the Authority has received 276 letters about the Schemes since August 2005, the majority of which were received in the consultation period for the 2006 Draft Orders. 95% (260 individuals) of these letters are opposed to the proposals, and 5% (16 individuals) are in support of the proposals. Most of the letters have come from people living near the A628/A57, although some have come from addresses outside the National Park.

## APPENDIX

### Background

1. A comprehensive and detailed analysis of the impacts of the Scheme upon the National Park is contained within the Authority's proposed submission to the Highways Agency (see list of background papers for obtaining copies of this submission).

### Changes in the Scheme

The following bullet points highlight the key changes made to the Scheme following the publication of Draft Order in 2007, when compared to those published in 2006.

- Route restraint measures including signals at junctions, speed limit controls, and pre-emptive accident remedial measures (additional to the selected and limited improvements) have been incorporated into the Scheme.
- Additional traffic signals and adjustment of the timings of existing traffic signals have been added to the original traffic signals that were proposed in the 2006 Draft Orders. These are aimed at inhibiting certain movements during peak hours at the junctions where they are situated, and to provide restraint to discourage vehicle journeys across the A628 within the National Park.
- Pre-emptive accident remedial measures are proposed, including; rumble strips, anti-skid surfacing, speed warnings, improvements to road studs, signing, and road markings. In addition, there will be a rationalisation of existing signs, and redundant signs will be removed.
- Further to the above changes, in line with recent Government guidance, speed limits along the A628 have been reviewed. The new Guidance makes reference to speed limits needing to pay attention to special qualities of National Parks. Therefore, as part of the Scheme the Highways Agency is proposing a 40 mph limit on the A628 from Tintwistle to Windle Edge, and 50mph between Windle Edge to Flouch on the A628, and 50mph on the A616 from Flouch to Langsett.
- The Agency has clarified aspects of the Scheme considered in the assessment, resulting in a slightly altered overall aim of the Scheme, this now reads as 'The Scheme would provide relief from congestion *and HGV traffic* flows through the three villages of Mottram, Hollingworth and Tintwistle...', (that in italics represents changes made to the 2006 Draft Orders)

### Summary of the Highways Agency's Alternatives Scoping document

As a direct response to one of the objectors to the Scheme, the Highways Agency is now assessing the following alternatives to the Scheme.

1. Area wide HGV ban in the National Park and speed restraint.
2. Area wide HGV ban in the National Park, speed restraint, investment in public transport, walking, cycling, road user charging, and smarter choices measures.
3. As with option 2, but with Local Transport Plan initiatives included.
4. Investment in Trans Pennine Rail Freight and Demand Management of road space.
5. Road user charging.
6. An alternative Bypass.

Officers of the Authority and Natural England have jointly responded to the above alternatives, and provided detail comment on the methodologies used and specific

points. In addition, we have requested that 2 further alternatives are assessed, which are the following;

#### 1. Measures in the National Park

This option would involve the implementation of the 'Route Restraint Measures (including signal control at junctions and speed limit controls) and Pre-emptive Accident Remedial Measures' as detailed in the Environmental Statement, with an opening date of 2009. This option should not include the bypass of Mottram, Hollingworth and Tintwistle, and will allow the benefits of the measures in the Park to be assessed as a free-standing scheme.

#### 2. Network Management

This option would consist of:

- (i) A lorry ban on the A628 and on all A roads in the National Park;
- (ii) A 40mph speed limit on all roads in the Peak District National Park; and
- (iii) A reduction in the proportion of illegal (those non-taxed and non-insured as these tend to be older vehicles that are statistically more likely to be involved in accidents and contravene MOT emission standards) vehicles on the A57/A628 through Mottram, Hollingworth and Tintwistle to 1%.

#### SPITS Elements

- 1. Traffic restraint incorporating speed management, safety and traffic reduction measures on all class A and B Trans-Pennine routes, and minor roads where significant diversion of through traffic could occur within the South Pennines area.
- 2. Managing and influencing the implementation of fiscal demand measures, such as road pricing and parking charges, where they affect traffic movements in the South Pennines area.
- 3. Creation of a network of 'safe roads' within the South Pennines area offering improved access for non-motorised users.
- 4. The development of measures to influence travel behaviour in and around the South Pennines area.
- 5. Improved/reinstated rail routes and services across or around the South Pennines area.
- 6. Improved long distance bus/coach services within or around the South Pennines area.
- 7. Improved local bus and rail services including integration, marketing, ticketing and technology.
- 8. Improvements to the A57/A628/A616 core trunk road across the National Park.

#### Resources

- 2. There will be financial implications in relation to representation at the Public Inquiry. Full details of this Inquiry will be made available after the pre-inquiry meeting on May 1st 2007. However, the Authority has set aside a budget of £57,000 to cover costs for employing appropriate counsel over the eight week Inquiry. In addition, the Authority has provisionally allocated some funding in the 2007/8 budget for engaging specialist assistance that may be necessary for the Public Inquiry preparation.



### **Risk Management**

3. Assessment of Impacts – the Authority has mitigated against the possibilities of an incorrect assessment of impacts through the establishment of an internal working group consisting of officers from key disciplines required to make an objective assessment of the issues. In addition, officers have consulted with Natural England and Derbyshire County Council in areas where it was felt that expertise was limited within the Authority.

### **Human Rights, Equalities, Health & Safety**

4. There are no significant aspects that relate to this report.

### **Consultees**

5. Members of the A628 Internal Working Group, Head of Law, and the Chief Executive have been consulted on the report and their comments incorporated.

### **Enclosures**

6. Annex 1 – Detailed Summary of Key Issues

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

7. A57/A628 Mottram-Tintwistle Bypass & A628/A616 Route Restraint Measures Draft Orders Response based on 2007 Draft Orders  
(hard copies of this document can be supplied by contacting Emily Davies: 01629 816213 or [emily.davies@peakdistrict.gov.uk](mailto:emily.davies@peakdistrict.gov.uk))

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