

# Transport for the North Strategic Transport Plan Public Consultation – Authority Response

## Transport for the North

### Strategic Transport Plan – Draft for Consultation (January 2018)

#### Introduction

The Peak District National Park Authority welcomes the opportunity to provide comment on the Transport for the North's Strategic Transport Plan – Draft for Publication (January 2018). This document constitutes a response on behalf of the Peak District National Park Authority to that Strategy. The response is comprised of three sections; the first contains some background information about the National Park, the second is of general comments about the Strategy, whilst the third contains detailed comments on the strategy.

#### Background information on the National Park

The Peak District National Park was the first of the UK's National Parks to be designated, in 1951. The Peak District National Park Authority has two statutory purposes as set out in the National Parks and Access to the Countryside Act (1949) and restated within Section 61 of the Environment Act (1995). These purposes are: -

- i) To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park, and
- ii) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park.

The two purposes have equal weight, except in cases where there is conflict between them. Should this occur, then the first purpose takes precedence. The Environment Act also places a statutory duty on National Park Authorities that in pursuance of their purposes, they should seek to foster the economic and social well-being of communities within the National Park.

In addition to the purposes and duty relating to National Park Authorities, Section 62 of the Environment Act (1995) places a statutory duty on bodies undertaking work affecting land within a National Park to have regard to National Park purposes. In the context of any work affecting land within the Peak District National Park, this duty applies to Transport for the North and any of its partners or agents.

The Peak District National Park is located at the centre of England, spanning the North and the Midlands. Less than one quarter of the National Park lies within the area bounded by Transport for the North (23%). This area contains approximately 7% of the Park's population. The remaining 77% of the area of the National Park lies within the Midlands and is covered by the Midlands Connect. The respective areas and population by districts are provided below in Table 1.

**Table 1 – The Peak District National Park divided by Council Area and population**

Sub-National Transport Body	City / Borough / District Council Area	Percentage area of the National Park	Population of the National Park (percentage) <sup>1</sup>
Transport for the North	Sheffield	10	955 (2.5)
	Cheshire East	6	1,305 (3%)
	Kirklees	3	250 (0.7)
	Barnsley	2	99 (0.3)
	Oldham	2	97 (0.3)
<b>Sub-total</b>		<b>23</b>	<b>2,706 (7.1)</b>
Midlands Connect	Derbyshire Dales	32	24,894 (65.2)
	High Peak	29	6,542 (17.1)

<sup>1</sup> Source ONS Constitutional Boundaries Population Peak District National Park population estimates, mid-2010 by part Local Authority

	Staffordshire Moorlands	14	3,873 (10.1)
	North East Derbyshire	2	153 (0.4)
<b>Sub-total</b>		<b>77</b>	<b>35,462 (92.9)</b>

The Peak District National Park boundary overlaps all of the above council areas to a greater or lesser extent. It should be noted that the Peak District National Park Authority is the Planning Authority for all of the land within these council areas within the Park boundary, irrespective of other constituent Authority boundaries.

## General Comments

The approach being taken by Transport for the North to plan ahead for transport demand for the long term future is supported. This approach will enable Transport for the North to take a proactive approach to planning for connectivity to new developments for business and housing. This will enable transport to better serve such development rather than react to it. With the expected growth in population and the need to address air quality and climate change impacts, a holistic approach to development planning, including for transport is sensible. In addition this approach enables better alignment of funding for development and transport, meaning that one can facilitate and add value to the other.

The document includes proposals for major transport schemes within the National Park, both road and rail. Since the publication of the Circular 04/76 Report of the National Park Policies Review Committee in 1976 there has been a presumption against major transport development in National Parks. This has continued to the present day with the English national parks and the broads: UK government vision and circular 2010; and the National Planning Policy Framework. The National Planning Policy Framework sets criteria that must be met in order to justify the exceptional circumstances that allow for development inside National Parks; these include the balance of the public interest against impacts of the proposals. Consideration is also given to the need for development and the ability to deliver it elsewhere.

This reflects the Statutory Protection afforded to National Parks, and sets extremely high tests that need to be met in order for major development to take place within National Parks. The Plan sets out strategic aspirations for transport schemes over the long-term and as such does not focus on detail. However, given the potential impacts of major development within the Peak District National Park, the National Park Authority cannot at this time be confident of the benefits of such schemes compared to their impacts. Therefore, the Authority is unable to be supportive of any of the proposed schemes being put forward within the National Park. Until there is a clear, well evidenced demonstration that a scheme is in the public interest, along with an understanding of the impacts and the ability to mitigate these impacts; and provide additional enhancement, the Authority must register its objections to those major road and rail schemes within the National Park.

## Detailed Comments

**Map (Page 2)** shows and names the Local Transport Authority Areas for the Transport for the North. The map includes an un-named pink area south of the Sheffield City Region Combined Authority, which constitutes parts of Derbyshire (Bolsover, Chesterfield, Derbyshire Dales and North East Derbyshire) and Nottinghamshire (Bassetlaw). This area forms part of the Sheffield City Region, but not within the Combined Authority Area. Whilst it is understood that there are still some outstanding political sensitivities about this part of the City Region, an un-named portion of the map has little purpose. It would be better to either label the area for what it is, or accept that it falls outside of the Transport for the North Area. At present it is just confusing, particularly as there is no reference to any of the aforementioned districts or their constituent counties anywhere within the document. This issue is further compounded by the use similar maps throughout the document.

## Introduction

**Map (Page 7);** please see earlier comments relating to the inclusion of Bassetlaw, Bolsover, Chesterfield, Derbyshire Dales and North East Derbyshire on maps of the Transport for the North Area.

## TfN's Vision and Pan-Northern Transport Objectives

**Promote and support the built and natural environment (Page 15);** this section offers an early opportunity to make reference to the five National Parks that wholly or partially lie within the Transport for the North Area. This is particularly important in relation to the additional designations ascribed to some or all of these Parks. These designations include World Heritage Site, Site of Special Scientific Interest, Special Area of Conservation and Special Protection Area.

As there is a general assumption within the National Policy Planning Framework (NPPF) against major development in National Parks, and there is a reference in this section to ensuring that transport developments are in accordance with the NPPF, it would help to establish an approach of protecting National Parks within the Strategic Framework at an early stage (please see the above reference to Transport for the North's Duty under Section 62 of the Environment Act (1995)).

We would also welcome clarification as to whether Transport for the North have undertaken an assessment of the overall public interest of their Strategic Plan against its potential impacts. For example, in the case of the Peak District National Park, proposals within the Strategic Plan are likely to have a negative impact on the special qualities of National Park. Such impacts are counter to the public interest in so far as they include the delivery of major transport infrastructure within a National Park. Whilst the Plan includes some dramatic predictions as to the value of the delivery of its schemes in total to the North, the evidence to support these predictions is not provided. Has there been an assessment made within the context of national and local policies as to the public interest of delivering major transport development within the National Park as opposed to the public benefit of not doing so?

## The North Today

**Infographic (Page 16)** refers to the five National Parks within the Transport for the North area. This reference is appreciated, as it demonstrates the importance of the National Parks to the area. There is also a reference to there being 6 UNESCO World Heritage Sites within the North. It would appear that this includes the Derwent Valley Mills World Heritage Site which covers a 15 mile stretch of the Derwent Valley between Cromford (Derbyshire Dales) and Derby City. It should be noted that this site falls within the East Midlands area rather than that of Transport for the North.

## The North's role in powering the UK economy

**Prime capabilities (Page 18);** there is a reference in each of the prime capabilities boxes to growth in GVA, which includes the following ".....(£2011)". It is unclear what is meant by this.

**Distribution of the prime capabilities around the North (Page 19);** please see earlier comments relating to the inclusion of Bassetlaw, Bolsover, Chesterfield, Derbyshire Dales and North East Derbyshire on maps of the Transport for the North Area.

**Page 20,** text states "*This is illustrated in the map on page 17*"; the map is actually provided on page 19 (see above).

Economic Infrastructure – Transport's role in the economy of the North (Page 23) states: -

*"it is vital that the transport network does not restrict tourism. Opportunities to enhance the built and natural environment through a carefully designed and operated transport network should be seized"*

National Park Authorities have a duty to promote opportunities for the enjoyment and understanding of the Park's special qualities, so there is a link here. However it is important that those special qualities are not so far compromised by the desire for a transport network, that they cease to be either special or an attraction to visitors.

**Transformational GVA Projections per person in the North in 2050 (Page 25);** please see earlier comments relating to the inclusion of Bassetlaw, Bolsover, Chesterfield, Derbyshire Dales and North East Derbyshire on maps of the Transport for the North Area.

**Connecting People (Page 30)** refers to the visitor economy in relation to National Parks. This is welcomed. Further down, the paragraph refers to Park's '*objectives*'. The following text refers to National Park '*purposes*'. We would suggest changing the wording from '*objectives*' to '*purposes*'.

The paragraph also refers to Transport for the North wishing to support the five National Parks in achieving these objectives. In reality, Transport for the North has a legal Duty to have regard to these purposes in undertaking any work within a National Park. We would welcome a rewording of the paragraph to stress this.

**Cross-border connectivity with the North's economic neighbours (Page 31)** refers to Transport for the North working with Midlands Connect and others. Given the confused nature of the maps referred to elsewhere within this document, a clear illustration of the respective boundaries might be useful; particularly in the case of the Sheffield City region area.

**Supporting the international connectivity of the North (Page 33)**; the sentence "*.....Independent International Connectivity Commission found that, of the **additional** 12 million **additional** passengers....*". We would suggest removing one of the "*additional*"s from the sentence.

**Moving goods (Page 34)**; refers to investment and growth of the Mersey and Humber ports and connectivity between them. The importance of the ability to move freight between ports is recognised. However, the current and potential future impact of that movement, on people, and particularly on National Parks should also be acknowledged.

**Current rail commitments in the North (Page 39)**; it is noted that in listing stations which need to be able to accommodate HS2 that Chesterfield is not included. Whilst it lies outside of the Transport for the North area, the borough area does feature on many of the maps within the report. Some level of consistency as to the area covered by the Strategy would be welcomed, particularly as the Map on Page 48 (The North's passenger rail network and stations) includes a number of the Midlands stations.

**Northern Powerhouse Rail (Page 46)** refers to 'Significant upgrades along the corridor of the existing Hope Valley rail line between Sheffield and Manchester. The Peak District National Park Authority has consistently safeguarded land along the line, within the National Park for the provision of a passing loop (Peak District National Park Local Plan 2001, Policy LT3)<sup>2</sup>. The recent announcement that this scheme would take place is supported by the Authority in respect of the benefits to National Park residents of additional local stopping trains within the Hope Valley. This approach of safeguarding land for future enhancement of the Hope Valley Line is continued within the Peak District National Park Core Strategy (2011); Policy T5<sup>3</sup>.

Over the last forty years, there has been a general presumption against major development in National Parks. This was clarified within Circular 04/76 Report of the National Park Policies Review Committee, and restated as part of the English national parks and the broads: UK government vision and circular 2010<sup>4</sup>. This position is further emphasised within the National Policy Planning Framework (paragraphs 115 and 116)<sup>5</sup>.

We believe that any 'significant upgrades' along the Hope Valley Line within the National Park, will be contrary to this presumption against major development within National Parks. As such we would need to be satisfied that any such scheme meets the tests stipulated within the National Policy Planning Framework (paragraph 116). We would also wish to be assured of net environmental benefits arising from the scheme. At present, the Strategic Transport Plan does not demonstrate this, and as such we are unable to support this element of the Plan.

This chapter also refers to shorter term improvements along the Hope Valley Line between Manchester and Sheffield. For any of these that are not part of the passing loop referred to above, the National Park

<sup>2</sup> <http://www.peakdistrict.gov.uk/publications/local-plan-2001/chapter11>

<sup>3</sup> [http://www.peakdistrict.gov.uk/\\_data/assets/pdf\\_file/0014/141215/LDF-CoreStrategyFinal.pdf](http://www.peakdistrict.gov.uk/_data/assets/pdf_file/0014/141215/LDF-CoreStrategyFinal.pdf)

<sup>4</sup> <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

<sup>5</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

Authority would reserve judgment until the detail of such proposals are brought forward. This should not be seen as being supportive of such measures. The potential impacts of such proposals on the National Park would need to be assessed against the benefits of enhanced rail connectivity to and from the National Park, and the removal of traffic from its roads.

Finally, this chapter also refers to the potential for “*a new line between Manchester and Sheffield*”, should significant upgrades to the Hope Valley Line not look promising. Should this building of a new railway line involve the delivery of an above surface route anywhere within the National Park, this would constitute major development within the National Park. As detailed above there is an historic presumption against major development within National Parks. Therefore any such scheme would also need to meet the tests stipulated within the National Planning Policy Framework (paragraph 116). The Strategic Transport Plan does not demonstrate that this is the case, and as such we are unable to support this element of the Plan.

**Major Road Network for the North and Strategic Road Studies (Page 56);** refers to the work in exploring how Highway’s England’s Air Quality Strategy can be expanded to include the Major Roads Network through future investment. This is a positive approach and supported.

The chapter also refers to proposals for a Hollingworth and Tintwistle bypass. The A57 Trans Pennine Upgrade Programme RIS1 scheme (the Mottram Moor and A57(T) to A57 Link Roads) is expected to increase traffic flows in the order of 1,200 vehicles per day on the A628 through Hollingworth and Tintwistle. We recognise the impacts that this will have in terms air quality, noise and vibration and severance on the residents of these villages. However, it should be acknowledged that such a route would involve road building within the Peak District National Park.

As referred to above within the response to the Chapter on Northern Powerhouse Rail, there is a presumption against major development in National Parks. Any such proposal would need to demonstrate that it met the tests stipulated within the National Planning Policy Framework (paragraph 116). At present, the Strategic Transport Plan lacks any detail to suggest that this is the case and therefore, whilst we would wish to see an improvement to conditions within the Peak District village of Tintwistle, we are not able to offer our support for this proposal.

**Strategic Road Studies (Page 57)** refers to the Trans Pennine Tunnel Strategic Study. The Peak District National Park Authority was supportive of an approach which enabled the provision of a Highways England Expressway entirely beneath the National Park. This approach enabled the provision of a weather-proof strategic road link connecting South Yorkshire with Greater Manchester, with minimal impact on the National Park. This option would also remove large numbers of surface vehicles from the National Park enhancing the landscape and environment of the Longdendale Valley. It would have also greatly benefited the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI). The Authority was disappointed to hear that this is no longer being considered as a viable option.

This section then goes on to suggest that the most promising alternative option is for a partially tunnelled route along the existing A628 route. It is our understanding that this would be likely to comprise a tunnelled section of dual carriageway between the Dog and Partridge Inn at Flouch and Pikenaze. This would bring significant enhancement to the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI).

It should be recognised that this tunnel would only account for approximately one third of the length of the existing route across the National Park. If no further enhancement / limited enhancement to the remaining surface sections of the road to the east or west of the tunnel were planned, then this might offer an acceptable alternative to a full tunnel.

However, it is our understanding that the intention is for the remainder of the route to be dramatically upgraded to comprise a full dual carriageway route from the Flouch roundabout to the junction with the planned Hollingworth and Tintwistle bypass referred to above. We also understand that the tunnel will not be the first element to be delivered.

This approach is likely to further impact on the South Pennine Moors Special Area of Conservation (SAC); Peak District Moors Special Protection Area (SPA); and Dark Peak Site of Special Scientific Interest (SSSI) with significant increased traffic flows, as the surface sections of the route will in all likelihood be completed first. There is also the potential for the surface sections to be completed and the tunnel shelved; in which case this would lead for demands for the surface connection to be made with all the associated additional impacts on the National Park.

As any scheme of this nature is major development within the National Park, it would be required to meet the tests stipulated within the National Planning Policy Framework (paragraph 116). At present it is unclear from the Strategic Transport Plan what regard Transport for the North are giving to National Park purposes and the impacts of such a scheme on the National Park. The text refers to an “*exemplar scheme involving environmental benefits*”. The tone of this suggests that a collaborative approach will be taken, and this is welcomed. Even so, there is still a lack of information detailing the benefits of the scheme and how these will outweigh the not inconsiderable impacts of the building of a surface level dual carriageway over two thirds of the existing A628 corridor within the National Park.

Because of the likely impacts of the scheme on the National Park, and the lack of detail at this stage to indicate how it would bring benefits that outweigh that harm, the Authority is unable to support the proposal. Indeed, given the scale of the scheme and its likely long-term impacts, the Authority has no choice other than to object to the proposal as it stands, until it can be proven to have met the tests within paragraph 16 of the National Planning Policy Framework.

We would, however wish to continue to work closely with Transport for the North and Highways England to fully understand the proposed scheme. We would also wish to help Transport for the North in achieving a scheme that delivers a strategic route without major impacts on the National Park.

**Integrated and Smart Travel (Page 58);** it is clear from the Strategic Transport Plan, that the Transport for the North area relies on cross-boundary travel into the Midlands, North Wales and Scotland. In delivering any smart travel solutions, it is important that they allow for easy cross-boundary travel. This is particularly important if the desire is to enable modal shift from the car to bus, rail and tram. For example, that part of Sheffield city region contained within the East Midlands looks to Sheffield for jobs and services. In addition Sheffield has particular air quality issues, largely related to transport. In order for smart travel to be able to aid in addressing this issue in relation to those journeys starting or ending in the East Midlands, the solution has to work across boundaries, without disadvantage to its users. This will require close working with Midlands Connect as a whole, and Derbyshire & Nottinghamshire County Councils in particular.

**Delivering the programme (Page 58);** the proposed delivery of integrated and smart travel is welcomed. However, it is important that passengers have a choice as to how they want to pay for their journeys. The old and vulnerable may be less comfortable with cashless payments and should not be disadvantaged in availability of service or financially because of this.

**Strategic Development Corridors (page 60);** according to the map, in addition to the Southern Pennines Corridor, there are four strategic development corridors that either cross or lie in close proximity to the Peak District National Park boundary. As such, the Authority would wish to be kept informed of any proposed developments in relation to the following corridors: -

- 1) Central Pennines
- 2) West and Wales
- 3) North West to Sheffield City Region
- 4) Yorkshire to Scotland

**West and Wales (Page 65);** this corridor includes Cheshire. As the Peak District National Park boundary includes part of the Cheshire East Council area, we would wish to be kept informed of any proposals in relation to this corridor.

**Central Pennines (Page 67);** this corridor overlaps Greater Manchester, Sheffield City Region and West Yorkshire. As the Peak District National Park boundary includes parts of Oldham, Kirklees, Barnsley and Sheffield council areas, we would wish to be kept informed of any proposals in relation to this corridor.

**Southern Pennines (Page 69);** the reference to the need to be sensitive to sustainability considerations including the Peak District National Park, whilst welcomed, does not go far enough. The Peak District National Park is a considerable asset to the North. It offers stunning landscapes, varied geology, a range of wildlife that in some cases is at the extremes of its northern and southern extent, and a cultural heritage spanning from pre-history through to the modern day. All of the above offer opportunities for visitors to both explore and learn about the National Park. In addition the Park offers a range of ecosystem services including carbon sequestration, rainfall retention / flood prevention, pollination of crops, and clean air & water.

It is important that Transport for the North recognises and acknowledges the wide local, regional and national benefits that the Park offers, and the fact that any proposals for major transport schemes within this corridor may impact on these benefits.

This section also includes reference to the A628 Climbing lanes proposal. It is our understanding that this is not being progressed at this time, as it does not form part of the current Highways England Trans Pennine Upgrade Public Consultation (February to March 2018). It should be noted that the Peak District National Park Authority formally objected to the A628 Climbing Lanes in April 2017 in response to the Highways England Non-Statutory Consultation of March 2017.

There is reference in this section to work on the Trans Pennine Tunnel Scheme and wider connectivity work. Please see our earlier comments in reference to this.

**North West to Sheffield City Region (Page 71);** as this corridor focuses on the Hope Valley Line, which crosses the Peak District National Park, it is somewhat disappointing that the Peak District National Park Authority has yet to be formally consulted in relation to this corridor.

As the corridor relates to the provision of rail improvements along the Hope Valley Line, please see our earlier comments under Northern Powerhouse Rail.

**Yorkshire to Scotland (Page 75);** this corridor overlaps Sheffield City Region and West Yorkshire. As the Peak District National Park boundary includes parts of Kirklees, Barnsley and Sheffield council areas, we would wish to be kept informed of any proposals in relation to this corridor.

**Cross-border relationships (Page 81);** it is important that there is close working across the boundaries with other national and sub-national transport bodies. As referred to in other places within the document, some clarification of the Sheffield City Region / East Midlands overlap would be useful, particularly in relation to the appropriate responsibilities and governance.

**Appraisal and Analysis (Page 88);** we appreciate that this document is a draft document, but at present, there is very little explanation as to how the benefits being quoted are achieved, or what evidence supports them.

In the case of the Peak District National Park the Plan has some very serious and long-reaching potential impacts, in relation to proposed schemes. Because of the high level of protection afforded to the National Park, and its value as an asset to the Nation, the North and the Midlands, the appraisal of these impacts cannot be undertaken lightly. There is a reason why for forty years, there has been the very strong presumption against major transport development in National Parks. The onus is on Transport for the North to demonstrate conclusively and robustly the reasons why this approach should not continue within the Peak District for the next forty years. This is particularly important because Transport for the North's plans extend beyond its boundary and into the Midlands. Therefore any benefits to justify a scheme within this National Park have to be at the National level and unachievable by any other means.

The National Park Authority would wish to have sight of any appraisal and analysis at an early stage where any scheme is being promoted within the Peak District National Park.

## **Summary of comments**

The Peak District National Park Authority recognises the ambition of the Transport for the North Strategic Transport Plan. We also see this approach as being a positive way of ensuring that the transport network matches the growth aspirations of the North and its constituent authorities.

However, we do have serious concerns about the potential impacts of the major road and rail schemes being proposed within the National Park. The Peak District National Park is an asset to the area, offering a green area for its surrounding conurbations. The National Park is accessible by 16 million people within a one hour journey by car. Whilst the schemes being proposed may increase the Park's catchment, it will potentially be at the expense of the special qualities that attract visitors in the first place.

Therefore, whilst we support the overall approach of the Plan, we are unable to do so for those schemes within the National Park. Until it can be proven that these schemes are in the public interest, and that they will lead to an overall net environmental benefit, the Authority must object to those elements of the Plan. This includes any new major improvements along the A628 road corridor, the Hope Valley rail corridor and any as yet unknown new railway lines.