

6. FULL APPLICATION - CONSTRUCTION OF NEW SEALING END COMPOUND, INCLUDING PERMANENT ACCESS. CONSTRUCTION OF TEMPORARY HAUL ROAD FROM BROOK HILL LANE INCLUDING WIDENED BELLMOUTH. CONSTRUCTION OF TEMPORARY TRANS PENNINE TRAIL DIVERSION TO BE USED FOR APPROXIMATELY 12 - 18 MONTHS FOLLOWING CONSTRUCTION APPROXIMATELY 410M OF SAID DIVERSION SURFACE WOULD BE RETAINED PERMANENTLY. ERECTION OF 2 BRIDGES (1 TEMPORARY AND 1 PERMANENT) ALONG THE TRANS PENNINE TRAIL DIVERSION, DUNFORD BRIDGE. NP/B/0819/0885 JK

APPLICANT: NATIONAL GRID

Summary

1. The application site straddles the National District National Park boundary at Dunford Bridge and hence two applications have needed to be submitted to both Barnsley Metropolitan Borough Council (in whose area the substantive application site area lies) and the Peak District National Park Authority. The Park Authority is therefore a consultee on the main application to Barnsley MBC.
2. The application seeks consent for those elements of the 'Peak District Visual Impact Provision Project' (VIP) that require planning permission. The VIP project aims to reduce the visual impact of National Grid's existing high voltage overhead electricity line upon the community of Dunford Bridge and the surrounding landscape by undergrounding the line and then removing a 2km section of the overhead line and 8 associated pylons. The line would be placed beneath the Trans Pennine Trail (TPT) from Dunford Bridge to Wogden Foot Local Wildlife Site adjacent the TPT. Although this section of overhead line starts within the Park it quickly steps outside, running roughly parallel to the TPT, the southern side of which forms the boundary of the at this point.
3. The undergrounding of the line and the removal of the overhead wires and pylons are works which do not need planning consent being development which National Grid (NG) can carry out under permitted development regulations.
4. Only a very small area of the application site boundary falls within the Peak District National Park Boundary and relates to approximately a 48m² section of the existing trail access way at the end of the TPT car park. This would form the start of the temporary trail diversion needed to facilitate the undergrounding and would run on a parallel route through the fields north of the river Don and the existing TPT.
5. The substantive part of the application site area forming the application to Barnsley Metropolitan Borough Council covers the rest of the 2km+ trail diversion route where there would be two new bridges (one replacement near to the Dunford end and one temporary one close to Wogden Foot LWS) to cross and re-cross the river Don along with construction access roads and lay down areas. Permission is also sought for the proposed new sealing end compound at Wogden Foot and the temporary construction road down from Brook Hill Lane to the temporary bridge crossing and also serve a tower replacement site close to Wogden Foot.
6. Within the National Park the project involves the removal of the large 'sealing end compound (SEC) and tower' which sits on the hillside above Dunford village along with two more pylons. The SEC at Dunford and its pylon transitions the cables up out of the Woodhead Tunnel to an overhead line carried by pylons heading east from Dunford broadly parallel to the TPT. Outside the National Park 5 more pylons would be removed and a new SEC to transition the line back up to overhead would be constructed farther down the TPT within part of the 'Wogden Foot' local wildlife reserve. Just to the NE of Wogden Foot the last pylon removed would be replaced with a stronger pylon being the

first tower carrying the cables as they transition up out of the ground from the new SEC at Wogden Foot back to an overhead line again.

7. The removal of this section of overhead line is permitted development and would bring substantial enhancement to the amenity of Dunford's residents and the immediate landscape and setting of the National Park. The project as a whole has been supported by Authority officers in pre-application stakeholder discussions. The part of the application proposal in the Park which needs planning consent is minor and uncontentious and therefore recommended for approval.
8. We conclude that the VIP project, when taken as whole, would provide a significant enhancement to the setting of the National Park landscape and particularly for the community at Dunford from enhancements to their amenity from the removal of the intrusive and overbearing sealing compound, pylons and overhead lines.
9. We therefore recommend for the substantive application site outside of the Park, that Barnsley MBC approve the application subject to conditions to secure necessary details, manage construction and traffic implications and with particular emphasis on securing the works to achieve the biodiversity net gains, derived from landscape and habitat enhancement both on-site and off-site.

Background / Introduction

10. Ofgem and National Grid (NG) agreed to a set of price controls and incentives for the period 2013-21 which included a £500 million fund to mitigate the impact of electricity transmission infrastructure in Britain's nationally protected landscapes – known as the Visual Impact Provision (VIP). Sites were identified in National Parks and AONB's across the country and the first section of line at Dunford Bridge was chosen within the Peak District National Park.
11. The Peak District VIP project aims to reduce the visual impact of National Grid's existing overhead electricity line in the proximity of Dunford Bridge which scored highly in terms of the adverse impact on the local community at Dunford. A national group of stakeholders known as the VIP Stakeholder Advisory Group have agreed that the best way to achieve this is to remove a 2km section of this overhead line and replace it with an underground electricity cable.
12. Since 2015, National Grid has held a series of technical stakeholder workshops and public consultation events. A local Stakeholder Reference Group for the project was set up at the onset of the project, and includes representatives from the Peak District National Park Authority, Barnsley Metropolitan Borough Council, the Trans Pennine Trail Organisation, Natural England, Yorkshire Wildlife Trust and Dunford Parish Council. National Grid has worked closely with the stakeholders to identify and develop this project, taking into account relevant technical, environmental, land and community considerations. The stakeholder reference group considered a number of options/routes before agreeing that this particular option in the planning application should be taken forward by National Grid.
13. Other than the very small piece of pathway at the start of the proposed Trans Pennine Trail the application site area covering the works needing planning permission lies mostly outside, but close to the National Park boundary and falls within the planning remit of Barnsley MBC determine. This report therefore considers the section within the Park, and provides the background for the Authority's consultation response to Barnsley about the impact of those works outside the Park upon the landscape setting of the Park, the community at Dunford Bridge and other relevant valued characteristics, which largely relate to ecological impact.

Site and Surroundings

14. Dunford Bridge is a small hamlet lying below Winscar Reservoir and its dominating embankment dam wall on the north-eastern edge of the National Park, some 2km north of the A628 and about 6km north-west of Langsett. The hamlet straddles the main road through the hamlet, Windle Edge Road, which provides access back to the A628 to the south-west in one direction and after leaving the hamlet in the other north-eastern direction, rises to join Brook Hill Lane which then runs through the other small hamlets of TownHead and Carlecotes on the way to join Bents Road which then links to the A616 north of Flouch roundabout.
15. The former Woodhead railway line emerges from the Woodhead Tunnel within the Dunford Bridge hamlet into a cutting. The tunnels and cutting are operational land for National Grid as the tunnel now carries the main electricity line between Sheffield and Stalybridge to avoid the landscape impact of pylons across the open moorland above. The route of the old railway line then runs eastwards away from Dunford Bridge parallel to the river Don and is now used as part of the Trans Pennine Trail (TPT).
16. A public car park accessed off the east side of Windle Edge Road within the centre of Dunford serves as a hub for the many visitors using this section of the TPT. The car park is subject to a separate planning application for its redesign and enhancement following the VIP project as the project would involve use of about half of the car park for construction access purposes.
17. Current (and post any development) access onto the TPT is via a public right of way from the east end of the car park. The first part of this access is also shared with a vehicular access track before peeling off to stay north of the TPT and the river Don to give access first to some Yorkshire Water infrastructure and then on via a bridge to the agricultural land north of the Don. This route would form the first section of the proposed temporary TPT diversion route during the VIP works.
18. There is a further shared vehicular access and public right of way onto the TPT from the main Windle Edge Road some 66m south of the car park immediately north of The Stanhope Arms. A pathway from this track leads down to the TPT before the access peels to the south east giving access onto the moorland south of the TPT.
19. The National Park boundary cuts across the end of the car park which is inside the Park. The amenity/picnic area and all but the first few meters of the TPT lies outside the Park and in the area administered by Barnsley MBC. The boundary then runs eastwards down the southern side of the old railway line boundary to exclude the TPT which is outside of the Park.
20. The moorland south of the TPT is designated in the PDNPA Landscape Character Assessment as falling within the 'Moorland Cloughs and Valleys' landscape character type within the 'Dark Peak' landscape character area. It is also Section 3 Moorland Natural Zone and CROW access land. The car park and a section of the TPT is also lie within Flood Zones 2 and 3 of the Don. The designated South Pennine Moors SAC and Dark Peak SSSI, are situated well to the west of the application site on the higher ground to the west of Dunford Bridge.
21. The landscape immediately around the village and start of the trail is dominated by the presence of the high voltage overhead line and pylons which carry the main electricity supply network across the Park between Sheffield and Stalybridge. The electricity cables were placed within the Woodhead Tunnel to avoid the landscape harm and access issues

otherwise involved in crossing the high moorland with visually dominant pylons. It transitions back to an overhead line at Dunford Bridge which then extends down the Don Valley in an easterly direction. The first three pylons are within the National Park and the first one, comprising of a 'sealing end compound' with pylon, which transitions the line from inside the tunnels up to an overhead line, and stands above the village, has a particularly dominating impact through its scale and location in terms of both local resident's amenity and its wider landscape.

22. The application site is located to the east of Dunford Bridge and straddles the National Park boundary and hence two applications have been submitted to both Barnsley Metropolitan Borough Council (in whose area the substantive part sits) and ourselves for a very minor portion at the western end. The section within the Park is a 48m² section of the application site area at the very western end comprising part of the TPT access path and shared vehicular access just east of the current TPT 'gateway feature' at the end of the car park.
23. The red line application site area mainly comprises of a corridor of agricultural grazing land lying to the north of the river Don and the TPT. It extends between the end of the TPT car park at Dunford Bridge down to and including a small part of the TPT and a section of a local wildlife site known as 'Wogden Foot' between the TPT and the river Don around 2km to the east. It also includes a corridor of grazing land extending northwards from Wogden Foot up to a proposed temporary construction entrance and bellmouth to be formed on Brook Hill Lane on the east side of Carlecotes hamlet

Proposal

24. This application seeks planning permission for those elements of the wider 'Peak District Visual Impact Provision Project' (VIP). The undergrounding of the line followed by the removal of the large 'sealing end compound' and first tower where the line comes up from the Woodhead Tunnel along with 8 pylons and their overhead wires are works which does not need planning consent hence this application only relates to the following aspects needing formal planning permission to facilitate the undergrounding project;
 1. Construction of a new sealing end compound, including permanent access at Wogden Foot LWS to transition the underground line back to overhead and join a replacement pylon just to the east;
 2. Construction of a temporary haul road down from Brook Hill Lane to the north including widened bellmouth;
 3. Construction of a temporary TPT Diversion route. This includes the only part of the application site within the National Park and comprises a 48m² section of this diversion route next to the Car Park. The diversion route would be used for approximately 12 - 18 months while the lines are placed under the TPT; following construction approximately 410m of the diversion surface from the car park end would be retained permanently.
 4. Erection of two bridges (one temporary crossing the Don at Wogden Foot and one permanent replacement closer to Dunford Bridge end where the current agricultural access crosses the Don) along the TPT diversion.
25. It was determined by Peak District National Park Authority and Barnsley Metropolitan Borough Council on 15th October 2018 and 2nd January 2019, respectively, that formal Environmental Impact Assessment would not be required given the scale and nature of the Proposed Project.
26. However, although the proposed project does not require a formal Environmental Impact Assessment and Environmental Statement, National Grid (NG) has produced a comprehensive Environmental Assessment Report (EAR), to demonstrate how it intends

to meet its environmental responsibilities and mitigate any environmental effects, covering all components of the proposed project, regardless of the consenting regime or no consent being required.

27. The application is also accompanied by a large number of supporting plans and reports which are available on both Barnsley MBC and PDNPA's website. These comprise;

- Design and access statement.
- Planning Statement.
- Planning drawings
- Environmental Assessment Report (EAR)
- Construction Environmental Management Plan (CEMP) Main Report and appendices comprising;
 - 1: National Grid's Environmental Sustainability Policy
 - 2: National Grid's Environmental Management System (EMS)
 - 3: Outline Landscape and Ecological Management Plan (LEMP)
 - 4: Outline Written Scheme of Investigation (WSI) for the Mitigation of Effects on Archaeological Remains
 - 5: Outline Construction Traffic Management Plan (CTMP)
 - 6: Outline Trans Pennine Trail Management Plan
 - 7: Outline Asbestos Management Plan
- Options Appraisal Study VIP Peak District East Project;
- Electric and Magnetic Fields Report; and a
- Statement of Community Engagement.

28. The application has been supplemented by amended/supplemented plans and reports since submission in response to various concerns from officers, consultees and representations.

RECOMMENDATION:

- A. That the application for that part of the site lying within the National Park be APPROVED subject to a condition ensuring that this section of the diversion route be restored to its former condition on completion of the works.**
- B. That Barnsley MBC be advised that PDNPA welcome the significant benefit to landscape and amenity the VIP project would bring and recommend the application made to Barnsley MBC be APPROVED and request that consideration be given to the inclusion of conditions to secure the following matters;**
 - 1. The fencing of the TPT diversion route on both sides and inclusion of this within the final agreed version of the LEMP.**
 - 2. The installation of crane pads for pylon removal (Pylons 162 &163) will adversely impact grassland and dwarf shrub habitat. Detailed measures to protect the ground and reinstate the habitats needs to be agreed and included within the revised LEMP.**
 - 3. Creation of species rich grassland within the old sealing end compound at Dunford Bridge post removal also requires detailed measures to be agreed. The Construction Management Plan includes provision for soil protection. These need to be developed further to take account of specific ecological requirements and be considered alongside a detailed strategy for protection/reinstatement/creation of grassland areas across the project as a whole.**

4. **The use of lighting during construction requires clarification and should be agreed to avoid harm to the TPT's role as an important foraging area for bats.**
5. **That the EAR, outline LEMP and the CMP submitted with the application are updated and developed to detailed final versions, in combination with secured detailed enhancement/management plans for off-site enhancement options (relevant stakeholders should be involved in this process). The final agreed versions should then be conditioned as part of any planning approval.**
6. **Alongside securing the temporary speed limits, agree details of additional signage so that the drivers of construction vehicles exiting the TPT car park are reminded of both the temporary speed limit, and the likely presence of walkers, cyclists and horse riders on Brook Hill Lane, Windle Edge and Goddard Lane.**

Key Issues

29. There are no planning concerns regarding the use of the small 48m² section of the application site area within the Park which is required for the start of the construction access/TPT diversion route, subject to its reinstatement afterwards.
30. The key issues therefore relate to the impact of the works proposed outside the Park to divert the TPT, construct the new sealing end compound and bridges upon the National Park itself and the local community at Dunford Bridge in terms of their ecological, landscape, amenity and traffic impacts.

Planning History

31. PDNPA and Barnsley MBC have determined that the development does not need to be subject to formal Environmental Impact Assessment.

Consultation responses

32. Highway Authority – No response to PDNPA application – Main comments being made to BMBC on the substantive application site.
33. District Council – No response to PDNPA application as BMBC are determining the substantive application site.
34. Dunford Parish Council – No response to the PDNPA on the section within the Park.
35. PDNPA - Landscape Architect – Fully supportive of the application as in my view it is fully in accordance with National Park purposes (1) to conserve and enhance natural beauty, wildlife and cultural heritage; and (2) promote opportunities for the understanding and enjoyment of the special qualities of the area by the public. He goes on to make a number of comments which have been incorporated into the landscape impact section below.

PDNPA Policy & Communities Service; Transport Team – No objections.

36. The works are likely to lead to negative impacts for road users on roads within the National Park, particularly Goddard Lane, Windle Edge and Brook Hill Lane. However, these impacts will be temporary in nature. The proposed measures to mitigate the impacts are likely to ensure that their effect is minimised. Therefore, from a transport perspective, there are no objections to the proposed scheme, and the likely enhancement to the setting of the National Park is welcomed.
37. PDNPA – Ecologist – Raises no objections subject to conditions
38. PDNPA – Archaeologist – No objections
39. There are no archaeological comments on the current application, because very little of scheme comes within the National Park boundary, and those elements of the works that do fall just inside the NP do not cause archaeological concern.
40. The wider undergrounding works at Dunford Bridge including aspects of work that can be carried out under permitted development – a number of these do require an archaeological response. However, there has been extensive consultation with myself and South Yorkshire Archaeology Service (SYAS) through the project development process, including agreeing the approach to archaeology (including elements of monitoring, building recording and protection of remains), the agreement of an overarching written scheme of investigation (WSI) for the whole programme, and the need for some additional WSIs to be agreed with SYAS and myself.
41. I am entirely satisfied with this approach and am confident that the archaeological outcomes both within and outside the planning process, that appropriate protection and mitigation will be achieved.
42. PDNPA - Rights of Way Team - No objections. Make the following Comments.
43. The Highway Authority (Barnsley Metropolitan Borough Council) will require the reinstatement of the trail after works to the condition the trail is presently in and we would echo their wish that this occurs. It seems to me that there is an opportunity to retain the proposed temporary diversion once works have been concluded, I am sure the developer is in contact with the TPT Head Office and we would support them in any proposals to keep the temporary route on site for the future as an additional route.
44. My main concern is HGVs accessing parts of the trail during works. I understand HGVs will regularly be accessing the route from Dunford to Salter's Brook. We are not the highway authority and do not have final say on these matters but I am concerned that such a well-used family friendly multiuser trail will have heavy vehicles on it. I would like to see the developer either using a banksman during working hours, or considering lowering the speed limit, perhaps by the use of speed bumps if necessary. The presence of riders on the trail makes it imperative that those who deliver to the site are aware of the variety of users and that steps are taken to ensure their safety. I am happy for the developer to discuss these issues directly with the highway authority but wished to flag up my concern on this point.

Representations

45. Given the development site straddling the National Park boundary which results in two applications, the major section being outside the Park it would appear most representation has been directed to Barnsley MBC on their application as there have only been 10 representations direct to the Authority 6 of whom raise objection and 4 supports. Within these representations are an objection from the Trans Pennine Trail

Rail Organisation who also o make a number of detailed comments, and a letter of strong support from the Friends of the Peak District. These are summarised below;

The objectors make the following points:

46. Scheme would marginally improve visual amenity at the expense of biodiversity.
47. Scheme brings very small benefits to the visual amenity of the Peak District National Park. The current pylons have been in position for many decades and are accepted as part of the landscape by most people.
48. The pylon to be built on Wogden Foot Local Nature Reserve will result permanent damage to the flora and fauna of this site that is a highly unusual combination of acidic and calcareous plant species that makes it of national significance. Efforts to recreate this habitat are unlikely to be successful.
49. The installation of the cables, roadways and bridges either permanently or temporary will seriously damage flora, including orchid species, and fauna, including ground nesting birds such as the curlew.
50. The roadways will undermine the financial viability of local farms due to loss of land, and division of fields. They will also impact on the recreational use of the Trans Pennine Trail.
51. Project does not represent a good use of taxpayer's money.
52. Project should be halted and the money saved used to install energy storage such as batteries, pumped storage and heat stores to enable the potential of renewable energy technologies to be fully realised.
53. The temporary haul road plus a bridge along with a permanent access road and bridge will have a greater impact on the wild scenic aspect of the valley than the present pylons which have been there for so long that people no longer notice them
54. The timescale of the work involved (up to 18 months) and the disturbance this will create will impact on the habitat of ground nesting birds and all wildlife that use this vital east-west wildlife corridor.
55. The disruption on the Trans Pennine Trail and its detrimental effect on the flora and fauna.
56. The notice does not inform the general public on the biodiversity issues involved in this scheme but puts landscape before anything else. What is important is that we need a living landscape with wildlife not a sterile park.
57. The scheme would effectively block any restoration of Woodhead for future railway use.
58. The huge environmental damage and the massive million-tonne increase in transport CO2 emissions that the proposals will help bring about.
59. Call for the proposal to be 'paused' while an independent inquiry is undertaken to investigate the full environmental and economic impacts and formulate a strategy for the integrated development of the Woodhead corridor, respecting the needs and abilities of all transport modes – rail, road and electricity transmission – to deliver optimum economic and environmental benefits for the Northern Powerhouse.

60. Proposals will prevent future restoration of the Woodhead railway for freight and passenger use, it will also significantly weaken the case for wider railway development along the Woodhead Corridor, and all this will have massive implications both for the environment and for the economic development of the Northern Powerhouse.
61. National Grid's undergrounding scheme will effectively block railway restoration and will encourage the development of the hugely damaging Trans Pennine Tunnel road scheme, resulting in the needless emission of over 1 million tonnes of CO2 per annum vs the transfer of freight to rail.
62. The level of temporary disruption to the community of Dunford Bridge is unacceptable as it does not provide any tangible benefits and the planning application does not demonstrate any reasonable mitigation to compensate residents for the disturbance suffered.
63. Does not contribute to Barnsley's aspiration for a low carbon economy and will increase CO2 production caused by construction.
64. Traffic implications of the HGV movements along the minor roads of this township plus light goods vehicles at a level which will completely change (to the detriment) the nature of this quiet rural hamlet.
65. The short to medium term impact upon local residents will be very significant particularly in respect of increased HGV traffic and noise pollution.
66. The TPT objects to the intention to only provide the trail diversion on a temporary basis. The Trail will not receive any 'gain' as part of these works and the provision of another route from the car park would provide an extremely valuable opportunity to provide a circular route that can be used by everyone both locally and nationally. Keeping the diversion will also have a route that can be used should an emergency closure be needed to access the underground cables following the programme completion.

The Supporters make the following points:

67. Removing the sealing end compound and tower will enhance the appearance of the village and additionally remove a source of noise especially during wet or damp conditions.
68. Removing the towers from the valley will also enhance the views from the village.
69. It will also enhance the experience of visitors to the village using the Trans-Pennine trail and also walking across Winscar Reservoir dam wall.
70. One supporter however feels the full impact to local residents and local business have not been taken into full consideration and particularly the adverse impact upon them during construction is underplayed.
71. The current tower shades our garden and solar panels, these works will improve our environment and benefit our solar generation.
72. The improvement to the car park would also be beneficial.
73. A few years of disruption for generations of enhanced enjoyment of a beautiful area are a small price to pay.

Although strongly supporting the Friends of the Peak District (FPD) raise the following comments / concerns needing attention by decision makers;

74. Notes the TPT represents a major potential transport asset for rail reinstatement, for which policies in both the PDNPA and BMBC's Local Plans allow and that electricity cabling is now in the 1950s rail tunnel.
75. Recognise the potential benefits of a new trans-Pennine rail route, including on the historic Woodhead route, with no immediate prospect of reinstatement of the rail route we do not see safeguarding as a reason to delay getting significant landscape and amenity benefits by the Dunford VIP and, hopefully, a longer stretch in Longdendale in the future. If re-development of the rail corridor becomes an option, then the costs of wire exhumation and relocation (which would also apply to the TPT) will be a minor part of the overall national infrastructure investment decision.
76. Understand the constraints but believe that a clear net gain in biodiversity must be secured from such a major project and welcome National Grid's commitment to finding ecological offsetting options for net gain on alternative sites in the vicinity of the project or, if this is not possible, in the local area. Net biodiversity gain should be a condition of approval.
77. Apart from the temporary construction impacts the main impact on the local community would be from traffic and the substantial increases in HGVs. This 20mph restriction should be extended through Dunford to the access to Lower Windleden reservoir.
78. On the section of Goddard Lane/Windle Edge between the A628T and the access to the Winscar reservoir should be reduced to 30mph as this whole lane from its junction with the A628T to the Dunford car park is part of the TPT on which horses, cyclists, walkers and mobility scooters would meet heavy traffic.
79. Major adverse impacts from noise from plant and construction works are predicted on some receptors. A mix of mitigation methods from super silencing of plants, acoustic barriers and excluding weekend working for some operations are proposed and should be enacted, where and when necessary.

Main Policies

80. National Planning Policy Framework

81. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales: Which are; to conserve and enhance the natural beauty, wildlife and cultural heritage and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. When national parks carry out these purposes they also have the duty to; seek to foster the economic and social well-being of local communities within the National Parks.

82. The National Planning Policy Framework (NPPF) replaced a significant proportion of central government planning policy with immediate effect when first published in 2012. The latest version of the NPPF was published on 19 February 2019. The Government's intention is that the document should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In the National Park the development plan comprises the Authority's Core Strategy 2011 and policies of the Development Management Policies document 2019. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and more recent Government guidance in the NPPF.
83. Paragraph 172 of the NPPF 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.'
84. Par 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures
85. Par 175. When determining planning applications, local planning authorities should apply the following principles:
- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
86. In addition, the Environment Bill, published by the UK Government in October 2019 and reintroduced into parliament (January 2020), includes proposals to make Biodiversity Net Gain a mandatory requirement within the planning system in England. Once adopted this will require all developments to achieve a minimum of 10% net gain in biodiversity units relative to the site's baseline biodiversity.

Peak District National Park Local Development Framework

87. Policy GSP1 sets out the broad strategy for achieving the National Park's objectives having regard to the Sandford Principle, (that is, where there are conflicting desired outcomes in achieving national park purposes, greater priority must be given to the conservation of the natural beauty, wildlife and cultural heritage of the area, even at the cost of socio-economic benefits). GSP1 also sets out the need for sustainable development and to avoid major development unless it is essential, and the need to mitigate localised harm where essential major development is allowed.

88. GSP2 Enhancing the National Park sets out that opportunities for enhancing the valued characteristics of the National Park will be identified and acted upon and that proposals intended to enhance the National Park will need to demonstrate that they offer significant overall benefit to the natural beauty, wildlife and cultural heritage of the area. They should not undermine the achievement of other Core Policies.
89. It goes on to say that when development is permitted, a design will be sought that respects the character of the area, and where appropriate, landscaping and planting schemes will be sought that are consistent with local landscape characteristics and their setting, complementing the locality and helping to achieve biodiversity objectives.
90. Opportunities will be taken to enhance the National Park by the treatment or removal of undesirable features or buildings. Work must be undertaken in a manner which conserves the valued characteristics of the site and its surroundings
91. Policy GSP3 sets out development management principles and states that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the National Park, design in accordance with the National Park Authority Design Guide and impact on living conditions of communities.
92. GSP4 sets out that the Authority will use planning conditions and or legal agreements to achieve the spatial outcomes in the plan.
93. DS1 - Development Strategy allows for DS1: states that in the countryside outside the Natural Zone the following forms of development will be acceptable in principle (where permission is required): utilities infrastructure; and other development and alternative uses needed to secure effective conservation and enhancement..
94. Policy L1 identifies that development must conserve and enhance valued landscape character as identified in the Landscape Strategy and Action Plan and other valued characteristics, and other than in exceptional circumstances, proposals in the Natural Zone
95. Regarding biodiversity the landscape and conservation policy L2: Sites of biodiversity or geodiversity importance states:
Development must conserve and enhance any sites, features or species of biodiversity importance and, where appropriate, their setting.
Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any sites, features or species of biodiversity importance that have statutory protection or are of international or national importance for their biodiversity.
96. Policy L3 – Development Strategy for Cultural Heritage Assets. States that development must conserve and where appropriate enhance or reveal the significance of architectural or historic assets and their settings
97. CC3: Waste management states in E that Construction and demolition waste must be managed and re-used on site. Where there may be significant environmental risk to flora, fauna, local communities or the water environment, an appropriate off-site disposal option will be required
98. CC5: CC5: Flood risk and water conservation states that Development proposals which may have a harmful impact upon the functionality of floodwater storage, or surface water conveyance corridors, or which would otherwise unacceptably increase flood risk, will

not be permitted unless net benefits can be secured for increased floodwater storage and surface water management from compensatory measures.

99. Core Strategy Policy T5 states that land and tunnels will be safeguarded for the potential re-instatement of the former Woodhead railway line but the policy also states that irrespective of the safeguarding of land, the principle is not accepted and any reopening proposal will be assessed on its merits and subject to rigorous examination including the continuity of the TPT which is required by Policy T6 to be retained irrespective of any railway use by realignment if required.
100. T6: Routes for walking, cycling and horse riding, and waterways says the Rights of Way network will be safeguarded from development, and wherever appropriate enhanced to improve connectivity, accessibility and access to transport interchanges. This may include facilitating attractive safe pedestrian and cycle routes between new residential or industrial developments and the centre of settlements. Where a development proposal affects a Right of Way, every effort will be made to accommodate the definitive route or provide an equally good or better alternative. Other long distance routes, will be protected from development that conflicts with their purpose. The continuity of the Trans Pennine Trail will be retained, irrespective of any future rail use, by realignment if required.

Development Management Policies

101. DM1 sets out that the National Park Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.
102. DMC1 Conservation and enhancement of nationally significant landscapes states any development proposal with a wide scale landscape impact must provide a landscape assessment with reference to the Landscape Strategy and Action Plan.
103. DMC2 relates to protecting and managing the Natural Zone and states that that one of the exceptional circumstances in which development is permissible in the Natural Zone are those in which the development is essential: (ii) for the conservation and/or enhancement of the National Park's
104. DMC3 sets out that where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage assets. Particular attention will be paid to siting, scale, form, mass, landscape setting and the valued character and appearance of the area.
105. DMC5 assess the impact of development on designated and non-designated heritage assets and their settings
106. DMC11 Safeguarding, recording and enhancing nature conservation interests seeking that proposals should aim to achieve net gains to biodiversity or geodiversity as a result of development.
107. DMC12 and 14 seek to ensure that sites, features or species of wildlife, geological or geomorphological importance seeks protection for sites, features or species of national importance and woodland are protected from harmful development and sets out the exceptional circumstances are where development is essential can be accepted.

108. Development Management policy DMC14 says that development that presents a risk of pollution or disturbance will not be permitted unless adequate measures are to control emissions within acceptable limits are put in place. Development Management. DMC15 covers Contaminated and unstable land
109. Policy DMT3 states that the provision of safe access is a pre-requisite for any development within the National Park but that where a new access would harm the valued characteristics of the National Park that refusal of planning permission will be considered. Development Management policy DMT6 requires development to be served by limited parking taking into account its location and visual impact.
110. DMT5 Development affecting a public right of way
A. Where a development proposal affects the route of a public right of way, either the definitive line of the public right of way should be retained, or, in exceptional circumstances, where retention of the definitive line is not possible, the developer will be required to provide an alternative route.
111. Our adopted Landscape Strategy and Action Plan is a material planning considerations along with our design guide which is and adopted supplementary planning document. The English National Parks and the Broads Vision and Circular 2010 is also a relevant material planning consideration.

Assessment

112. The VIP project at Dunford would bring significant landscape enhancement and benefits to local visual amenity. However to achieve those benefits requires a substantial construction effort which we recognise will have adverse visual effects, as well as through noise, increased activity and inconvenience as well as increased HGV traffic for a lengthy period upon the quiet tranquillity of those this valley and in particular upon the community of Dunford and upon the surrounding minor settlements.
113. These adverse impacts would however be temporary but still be last for some 18 months at varying levels and are unavoidable as a proposed project of this scale could not be achieved without some significant adverse effects of construction. Consequently the stakeholders have been keen to ensure that within the overall support in principle for the project, that the landscape and amenity benefits would outweigh the temporary adverse impacts and that the project would deliver an overall biodiversity net gain. to mitigate the adverse impacts on local biodiversity and bring an overall enhancement. As the application has progressed the mitigation has been developed and refined and whilst we have reached a point where our specialist in-house advisors are generally happy with mitigation there remains some areas of concern which we feel can now be addressed through conditions and legal agreements.

Landscape Considerations

114. The PDNPA Landscape architect considers that the VIP project would significantly reduce adverse landscape and visual effects within the National Park and on the setting of the National Park and create an enhanced 'gateway' to the Park for the people of Barnsley / edge of Kirklees. Whilst he has some concerns about Landscape and Visual chapter of the ES being rather impenetrable, he comments that it does demonstrate significant benefits to the Park.
115. Our landscape architect has carried out his own assessment of the likely visual benefits of the scheme. He comments that with the current situation with the overhead pylons, a high magnitude of adverse visual effect is experienced by a range of receptor groups (including residents, users of recreational routes and users of the local highway network)

in the vicinity of Dunford Bridge with lower adverse effects visual experienced in a wide geographic area.

116. He goes on to comment that the likely residual visual effects of the completed undergrounding scheme which removes the visual detractors from the Park and its setting would result in significant visual benefits for a range of receptors including residents in Dunford Bridge, users of the TPT, users of the local road network, visitors to Winscar reservoir and viewers from the open access land within the Park to the south.
117. His advice to the Development Management Service is that the scheme would be able to demonstrate significant beneficial visual effects in the vicinity of Dunford Bridge as a result of the removal of the pylons (but with the potential for some more localised adverse effects in the immediate vicinity of the new SEC). The Planning officer concur with this view and consider that whilst the new sealing end compound does bring with it a negative landscape impact the structure is relatively low and partially screened and the overall judgement within the context of the scheme as a whole is that we consider this is outweighed by the benefits.
118. Our landscape architect also comments that the ES does not consider the significant beneficial effects on the setting of the village of Dunford Bridge; the existing SEC is a hugely detracting element in the setting of the village. The SEC and the transmission line running east from the compound have been examined from vantage points outside the Park from where we consider they are also major detracting elements in the approach and setting to the Park from the edge of Barnsley and Kirklees. The removal of these elements would offer a major landscape enhancement in the vicinity of Dunford Bridge.
119. However, while the removal of the pylons will remove a locally-significant detracting landscape element, our landscape architect considers that for the major landscape benefits to be secured in more than the local area the scheme needs to positively enhance the wider landscape around Dunford Bridge and the edge of the Park. These off-site enhancement proposals have only just been finalised and were not included in the initial application. These comprise habitat creation and enhancements along the river corridor, woodland planting and management on two farms elsewhere whose delivery needs to be secured and hence a planning condition is recommended to ensure these are incorporated into the relevant plans and reports.
120. Subject to those suggested conditions the landscape benefits in the scheme are significant and would achieve substantial enhancement to the immediate environment of Dunford Bridge and to the wider valley and setting of the National Park, particularly in views from outside the Park looking south toward the moorland landscape where currently the line dominates the foreground.

Ecological Considerations

121. National Grid committed to ensure that the project delivers a net gain to biodiversity and have worked with stakeholders including the PDNPA though engagement with our ecologist in specific ecology workshops to develop and amend their plans to compensate for habitats and species which may be adversely impacted by the Proposed Project.
122. While our ecologist has raised a number of concerns during development of the scheme and the application process, these have largely been addressed, resulting in her overall support for the amended scheme provided the key benefits and enhancement promised to achieve the biodiversity net gain being secured by planning condition.

123. Our ecologist's detailed comments in response to the proposal are summarised and discussed in the following paragraphs.
124. NG and our own ecologist recognise that despite efforts to reduce the footprint as much as possible, particularly along the cable installation corridor and within Wogden Foot Local Wildlife Site, ecological impacts are unavoidable. It is proposed that impacts upon habitat and species will be mitigated by measures adopted through the Landscape and Ecological Management Plan (LEMP).
125. The Habitats Regulations Assessment (HRA), which has been undertaken and agreed with Natural England, has concluded that there will be no likely significant effects on the designating features of the SAC due to the distance of the works from the feature being sufficient to ameliorate any risk of noise disturbance impacts to SPA bird species.
126. In terms of Dark Peak SSSI birds again the project does not fall within the SSSI boundary and therefore no direct impacts upon SSSI qualifying habitats are expected. Breeding bird surveys have confirmed the presence of breeding lapwing and curlew using grassland and moorland habitats to the north and south of the TPT. Although these breeding territories do not fall within the designated boundary of the Dark Peak SSSI, it is reasonable to anticipate that they form part of a wider population that supports the conservation status of the SSSI bird population.
127. The Proposed Project will involve increased noise during construction and could occur at various times within the bird breeding season. However, our ecologist concurs with the applicant's advisors view that the temporary impact of increased human presence is unlikely to undermine the status of the bird populations that support the nationally important interest features of the Dark Peak SSSI.
128. For the nearest lapwing territory there is unlikely to be noise impact and for the nearest recorded curlew territories the temporary displacement of these is not considered likely to undermine the conservation status of the wider population of the Dark Peak SSSI. Therefore, the temporary impact of increased noise construction disturbance upon the bird populations that support the nationally important interest features of the Dark Peak SSSI is considered to be Negligible.
129. Within the zone of influence of the project area, it is anticipated that best practice construction measures, and not undertaking piling works during the breeding bird season are likely to provide an important element of mitigation for nesting birds generally.
130. The wooded corridor of the TPT is recognised as an important feature, and in combination with the River Don provides an important habitat and corridor for flora and fauna which means the woodland corridor is assessed as of district importance. In particular it is a valued habitat for birds and bats and for them is of district importance.
131. Significant tree removal along the TPT would be required to facilitate undergrounding. The stakeholder group has sought to minimise the impact on this feature as much as possible, to retain connectivity and functionality along the River Don embankment and corridor on the southern side of Trans Pennine Trail. The Landscape and Ecology Management Plan (LEMP) provides detail on measures to protect this feature and compensatory measures post construction (both on and off-site). Additional measures which have previously been identified to minimise cumulative impacts on this habitat and associated species includes fencing the diversionary TPT on both sides. This has not currently been included in the LEMP and it is recommended that this is addressed with the final agreed version.

132. Two of the pylons to be removed, the first two from the Dunford SEC which stand on the hillside to the south of the Stanhope Arms are the only ones located within the PDNP and also within the Western Moors Local Wildlife Site. The installation of crane pads for the pylons removal will adversely impact grassland and dwarf shrub habitat. Detailed measures to protect the ground and reinstate these habitats therefore needs to be agreed and included within the revised LEMP.
133. The creation of species rich grassland within the old sealing end compound at Dunford Bridge post removal also requires detailed measures to be agreed. Currently the Construction Management Plan includes provision for soil protection. These need to be developed further to take account of specific ecological requirements and be considered alongside a detailed strategy for protection/reinstatement/creation of grassland areas across the project as a whole.
134. The use of lighting during construction requires clarification and should be agreed to avoid harm to the TPT's role as an important foraging area for bats.
135. Breeding Willow Tit are present at Wogden Foot LWS and are an important and declining species and therefore a key consideration in the mitigation process. Significant discussion has taken place over concerns from all parties as to the impact of the new SEC. Specific measures have been put forward to mitigate the impact on this species with habitat enhancement and creation of new habitat. This area is unknown to the PDNPA ecologist who defers to Barnsley Biodiversity's Officer's view on this. In principle however we support the approach and if supported by BMBC officers would need to be secured appropriately within any planning approval.
136. The EAR , outline LEMP and the CMP submitted with the application provide the appropriate detailed mechanisms to secure the mitigation measures proposed and therefore our ecologist has recommended that these are updated and developed to detailed final versions, in combination with secured detailed enhancement/management plans for off-site enhancement options. Our ecologist further recommends that the relevant stakeholders are involved in this process and that the final agreed versions should be conditioned as part of any planning approval.
137. A Biodiversity Net Gain (BNG) Assessment has been undertaken to help quantify biodiversity impacts and inform proposals. The assessment baseline habitat value of the site is 102 units and post project completion (including all habitat retention, creation, enhancement and succession) the project represents 81.59 units, which equates to a net biodiversity loss of 20%.
138. 'On-site' options for achieving net gain are limited and the Stakeholder group identified a number of enhancement measures for NG to consider to strengthen, compliment and link the habitats affected by the proposals, the expectation being that these would be adopted and developed further.
139. Unfortunately, none of these have been taken forward and sites further afield, and not related to the site or its impacts, are now being offered (28th April 2020). There has not been any ecology stakeholder involvement in these sites but they may be able to demonstrate a biodiversity net gain. These are not known to the PDNPA and we defer to Barnsley to comment on the suitability of these sites. These include management of land at Hazelhead wind farm, Crow edge and NG's ecology team estimate that this will deliver c12% net gain, with additional planting at woodland planting (5,400 trees) at two farms in Penistone which along with the Willow tit enhancement at Wogden Foot and the new habitat for them alongside NG are confident will equate in total to a net 10% gain.

140. Given the above our ecologist strongly recommends that sites put forward for biodiversity net gain are agreed by relevant ecology parties prior to determination. Should the planning application be approved we therefore recommend that the LEMP, CMP and EAR are conditioned and updated with stakeholder engagement to address outstanding matters, including those above.

Traffic Considerations

141. Due to the scale of the works and the constrained working areas a main adverse impact for the local communities of Dunford within the Park and Town Head and Carlecotes just outside, would come from the construction traffic accessing the works along what are local roads which are generally unsuitable in width, gradient and alignment for HGV's. Nevertheless this situation is not unique in construction projects but will require careful management to mitigate and minimise the adverse impacts upon local residents as well as visitors to the TPT and wider local area.
142. The transport of materials to and from the site will be directed onto roads that border or pass through the National Park, including the A616, A628, Goddard Lane and Windle Edge / Brook Hill Lane. This includes additional traffic movements through the settlements of Langsett and Dunford Bridge.
143. The access route for vehicles to and from the site includes on-road sections of the TPT and at present, these roads are lightly trafficked, with very low numbers of heavy goods vehicles. The works will lead to a temporary, but proportionally significant increase in vehicles overall and heavy goods vehicles in particular. This could potentially discourage use of this part of the Trans Pennine Trail by less confident users and concern has been expressed in representations about the adverse impacts for all users but particularly horse riders and cyclists along these sections where often the narrow verges and lack of footways mean it would be difficult at best and often impossible to get back from passing HGV traffic.
144. The Environmental Assessment Report (EAR) and the Outline Construction Management Plan (CMP) contains proposed measures which will minimise these impacts, and which are welcomed and supported. These measures include the proposed introduction of temporary speed limits of 40mph between the A628/Goddard Lane to the west of Dunford up to the reservoir access, and then 20mph beyond down and through Dunford to a point 50m east of the proposed new construction access which would join Brook Hill Road just east of Carlecotes.
145. This approach is supported by our traffic planners as it would help to address the impact of both the overall increase in traffic (including HGVs), as well as mitigate the fear and intimidation experienced by more vulnerable users of the on-road Trans Pennine Trail route. However, they recommend additional signage so that the drivers of construction vehicles exiting the TPT car park are reminded of both the temporary speed limit, and the likely presence of walkers, cyclists and horse riders on Brook Hill Lane, Windle Edge and Goddard Lane. This is therefore included as a suggested condition in the above recommendation.
146. The Dunford Bridge car park would be halved in capacity due to construction access needs, from around 40 to 20 spaces during the works and of course the TPT down to Wogden Foot would be diverted to the north along a temporary route. Although still accessible this will likely discourage a number of users until works are complete however these temporary measures are welcomed and supported. Whilst the TPT organisation would wish for the TPT diversion route to be retained post works to provide a circular route for visitors to use this is not part of the scheme. Whilst officers agree this would be an excellent idea in principle which we would normally support there would be significant

difficulties to resolve with regard to such permanent or concessionary access which lie outside the scope of the current applications.

147. Consideration has been given to the use of Travel Plans in the Outline CMP and makes the case for the impracticality of providing one for the workforce. The difficulty of accessing the site by sustainable transport is recognised and therefore, in this case, our Traffic planners have not recommended the production of a workplace Travel Plan, although the measures suggested within the CMP in relation to shared transport options for the workforce are welcomed.
148. The conclusion is that whilst the project will lead to negative impacts for the immediate local communities and road users on roads within the National Park, particularly Goddard Lane, Windle Edge and Brook Hill Lane, these impacts will be temporary in nature. The proposed measures to mitigate the impacts are likely to ensure that their effect is minimised. Therefore, from a transport perspective, there are no objections to the proposed scheme subject to the suggested conditions covering additional signage and securing of the proposed speed limit reductions.

Conclusion

149. We conclude that the VIP project, when taken as whole, would provide a significant enhancement to the setting of the National Park landscape and particularly for the community at Dunford from enhancements to their amenity from the removal of the intrusive and overbearing sealing compound, pylons and overhead lines.
150. The removal of this section of overhead line is permitted development. The part of the application proposal in the Park which needs planning consent is minor and acceptable and is therefore recommended for approval.
151. The VIP project as a whole could not be achieved without some significant adverse effects of construction. However the majority of construction impacts are temporary and reversible, and measures have been proposed to limit and mitigate them.
152. We therefore recommend for the substantive application site outside of the Park, that Barnsley MBC approve the application subject to conditions to secure necessary details, manage construction and traffic implications and with particular emphasis on securing the works to achieve the biodiversity net gains, derived from landscape and habitat enhancement both on-site and off-site.

Human Rights

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

List of Background Papers (not previously published)

Nil