

13. TRANS-PENNINE TUNNEL STUDY AND A628 UPGRADE (JRS)

1. Purpose of the report

This report provides Members with an update on the current position regarding the A.628 and the proposed upgrade of this trans-Pennine route, including proposals for a road tunnel along part of the route.

2. Key Issues

- **The impact of a major Road scheme on the special qualities of the National Park**
- **The impact of increased traffic flows on our climate change strategy**

Recommendation:

3. 1. That the report be noted.

How does this contribute to our policies and legal obligations?

4. Core Strategy GSP1: Securing national park purposes and sustainable development. Part A states that *'all policies must be read in combination'*. Part B states that *'all development shall be consistent with the National Park's legal purposes and duty'*. Part E states that *'in securing national park purposes major development should not take place within the Peak District National Park other than in exceptional circumstances. Major development will only be permitted following rigorous consideration of the criteria in national policy'*. Part F states that *'where a proposal for major development can demonstrate a significant net benefit to the National Park, every effort to mitigate potential localised harm and compensate for any residual harm to the area's valued characteristics would be expected to be secured'*.

Core Strategy L1: Landscape character and valued characteristics; Part B states *'Other than in exceptional circumstances, proposals for development in the Natural Zone will not be permitted'*.

Core Strategy Policy T1: Reducing the need to travel and encouraging sustainable travel; Part B states that *'Cross-Park traffic will be deterred'*, whilst Part E states that *'Impacts of traffic within environmentally sensitive locations will be minimised'*.

Core Strategy Policy T2: Reducing and directing traffic; Part B states *'In exceptional circumstances, transport developments (including expansion of capacity, widening or a new route) that increase the amount of cross-Park traffic may be accepted where: there is a demonstrable long term net environmental benefit within the National Park'*. Part C states *'No new road schemes will be permitted unless they provide access to new businesses or housing development or there are exceptional circumstances. Those road schemes (including improvements) that fall outside of the Planning Authority's direct jurisdiction will be strongly resisted except in exceptional circumstances'*.

Background and Assessment

5. The Authority is a member of the Trans-Pennine Tunnel Study (TPTS+) Board, which meets monthly. The Board is attended by the Director of Conservation and Planning,

or the Head of Policy and Communities as his substitute. The Board comprises representatives of the Department for Transport, Highways England, Transport for the North, Greater Manchester Combined Authorities and Sheffield City region, together with the Authority. It is chaired by Highways England and is serviced by planning, highways and environmental consultants WSP. It follows on from an earlier Trans-Pennine Tunnel Study Board and a Wider Connectivity Board.

The Board is currently considering plans for improvements to the A.628, which form part of Transport for the North's Strategic Transport Plan for trans-Pennine connectivity. Following initial investigations for a full tunnel, the current strategy is a shorter tunnel under the highest part of the route, roughly following the line of the current A628 corridor. The likelihood is that the remaining two thirds of the route (within the National Park) would comprise a dual carriageway.

The Authority considered the TfN Strategic Transport Plan in March 2018 when it was acknowledged that such an approach would, once the tunnel (approximately 9 km in length) was built, significantly enhance the South Pennine Moors Special Area of Conservation (SAC), the Peak District Moors Special Protection Area (SPA) and the Dark Peak Site of Special Scientific Interest (SSSI), due to the removal of traffic from the highest section of the existing route. However, the significant upgrade to the remaining corridor would constitute major road building within the National Park and it was noted that since 1976 there has been a general presumption against major road development within National Parks. At that time it had been indicated that any such route would be delivered as an exemplar scheme involving environmental enhancements to benefit the Peak District National Park' but the Authority was concerned that the evidence to demonstrate such benefits as part of the overall justification of exceptional circumstances has not been clearly demonstrated within the Strategic Transport Plan. Given our existing Core Strategy policies and the longstanding National presumption against road building in National Parks, it would be extremely difficult to be supportive of such a proposal. However, officers continued to be engaged with TPTS+ Board in order to advocate the Authority's position and to ensure that it is an exemplar scheme that achieves net environmental gain.

6. In April 2020, at the request of the TPTS+ Board, the Director of Conservation and Planning sent a letter to the Department of Transport setting out the current position of the Peak District National Park Authority on proposals to upgrade the Trans-Pennine road connection between Manchester and the M1/Sheffield City Region, along the A628 corridor. As noted above, the Authority's response to the wider Trans-Pennine study and proposals was set out in our response to the Strategic Transport Plan in April 2018. As part of our response we said:

"Unless there is a clear, well evidenced demonstration that a scheme is in the public interest which clearly outweighs any negative effects on the National Park, 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".

However, as noted above, we have been committed to close engagement with the project team. Our engagement has been framed in a more constructive way to the effect that we could support an exemplar proposal that delivers significant net environmental enhancement to the National Park, reducing and mitigating the negative impacts that the current A628 has on the landscape character, biodiversity, tranquillity and public enjoyment of the National Park. We have therefore been working with project partners to produce a scheme that achieves these outcomes, with recent workshops focussing on how the scheme could have an impact on access to and

within the National Park, and on biodiversity net gain (BDNG). We have also been involved in two workshops hosted by Highways England Design Panel, both at a much earlier stage than is normal practice. Any scheme must take account of and give significant weight to the National Park's designation, together with any other designations along its route. We have made it clear that it must avoid a "mitigation" approach and seek environmental gain, with a scheme of an exemplary standard.

7. In recent TPTS+ meetings, the Board discussed the packaging and phasing of the scheme. Whilst officers have acknowledged that a scheme of this magnitude will be delivered over many years, we have made it clear it will be important to the National Park Authority to see the programme deliver environmental enhancements early in the phasing, rather than leaving these to the end of what is likely to be a 20 year programme, during which traffic levels will increase significantly. We have also said that it is also essential that the whole scheme, including the significant length of tunnel currently proposed, is constructed, otherwise it is unlikely to deliver the full range of environmental benefits. Indeed, just delivering some parts of the scheme could put unacceptable pressure on the National Park and its special qualities. The letter from the Director of Conservation and Planning states that *"Without a clear commitment from the Department for Transport and its partners to implement the full strategy and to undertake the whole scheme, including those elements that will give the significant environmental enhancements that the National Park Authority seeks, the Authority would not be able to support it."*

The next step is that the scheme will be considered by the Department for Transport's Investment Portfolio and Decisions Committee, probably in July (having been deferred from May). If the scheme is given the go ahead, it will then proceed to Stage 1 of the design process.

Are there any corporate implications members should be concerned about?

8. **Financial:** Any formal opposition to a proposed scheme will bring resource issues for the Authority if the scheme goes to a Public Inquiry. These would include staff time and the financial implications of appointing a barrister if necessary.

Risk Management: There is a reputational risk associated with opposing the improvement of traffic conditions along the A628, and particularly within the communities of Mottram, Hollingworth and Tintwistle.

Sustainability: The support of major roads schemes is contrary to the sustainability agenda of the Authority.

9. **Background papers** (not previously published) – None

Report Author, Job Title and Publication Date

John Scott, Director of Conservation and Planning: 13 May 2020