

1. RESPONSE TO THE A628 TINTWISTLE – MOTTRAM BYPASS (A811/SAT)

1. Proposal

That the National Park Authority should object to the proposed A628 Tintwistle – Mottram Bypass as it stands for the following main reasons;

1. The National Park Authority is extremely concerned that the scheme does not meet its overall aim, objectives and sub-objectives sufficiently.

2. Due to the severity of the impacts that the proposed scheme would have on the National Park, as summarised within the report, the fundamental reasons for objecting are as follows:

- The predicted significant traffic growth and all the secondary impacts of this, for example on air quality, noise and access and recreation, are significantly detrimental to achieving the Authority's first key purpose.
- The significant adverse impacts of the proposed scheme on the landscape are unacceptable. This is both the direct impacts of the road itself and its associated infrastructure, and the indirect impacts of the significant visual impact of the scheme on and from the National Park.

The two points of objection above are heightened by the fact that the Authority is not satisfied that the evidence provided by the Highways Agency provides the Authority with sufficient comfort that all alternatives to a Bypass have been fully explored, or that the proposed Bypass is the best engineering design to provide the aim of the scheme with the least detrimental impacts on the National Park. In addition, many of the methodologies adopted for assessing the impacts of the proposed scheme are totally inappropriate for a National Park setting.

2. RECOMMENDATION:

That

- 1. the Authority objects to the A628 Tintwistle – Mottram Bypass as it currently stands**
- 2. the Authority registers this objection with the Highways Agency through the submission of the response listed in the Background Papers**

Policy/Legal Background

3. A draft Environmental Statement (ES) for the proposed scheme was published in November 2005. This ES in its revised version published with the Draft Orders in January 2006 have provided the basis for officers to assess the impacts of the proposed scheme on the National Park. Officers have brought together the results of this assessment within the draft submission (see List of Background Papers) which will form the basis of the Authority's formal submission on the scheme to the Highways Agency. The deadline for submissions is May 5th 2006 and will form the basis of the Authority's evidence at the Public Inquiry, due to begin on October 3rd 2006. In developing the response officers have consulted with the Highways Agency and its appointed consultants along with other statutory bodies such as English Nature and the Countryside Agency. Members have been kept abreast of developments through a series of workshops and briefing notes.
4. The principal aim of the scheme is to provide relief from traffic congestion to the villages of Tintwistle, Mottram and Hollingworth. The total length of the proposed Bypass is 5.7 km, described as the Main Study Area, of this 1.3 km lies within the

National Park. The Extended Study Area includes impacts of the proposed scheme across the Dark Peak, which includes the following designations; the South Pennines SAC, the SPA and SSSI. The maps in the Appendix show the location and position of the scheme in relation to the wider geography of the area.

5. The Authority has always given an *in principle* support for a scheme that relieves the three villages from traffic congestion, and as such is reflected within the South Pennines Integrated Transport Strategy and inclusion within the Authority's Structure and Local Plan policies. The Authority has consistently applied this *in principle* support for the scheme in all its policy making decisions since the scheme was first proposed. However, in reaching these decisions the Authority has always reserved the right to its own position on a proposed scheme once details of the environmental impacts upon the National Park have been published within the Draft Orders.

Key Issues

6. The paragraphs below set out the key issues of the proposed scheme and how they impact upon the National Park.

Traffic Figures

7. The traffic figures indicate that the Bypass will reduce the traffic flows within the village by 71%, hence significantly reducing the current congestion problems. However, figures for the A628 east of Tintwistle are forecast to increase by 84% to 19,300 vehicles in 2010 and by 133% to 23,300 vehicles in 2025. This increase is caused by ;
 - traffic diverting from adjacent routes within the National Park onto the A628 (hence providing some relief on these routes); as well as
 - additional traffic being diverted off the M62 into the National Park
8. Due to the complexity of traffic flows it is important to consider the net effect of the scheme on traffic flows across the National Park. This assessment indicates an increase of annual average daily trips of 27% in 2010 (up to 29,700 vehicles) and a 34% increase in 2025 (up to 35,500 vehicles) within the modelled area of the Park. Much of this increase in growth is on the A628 and A6204, both of these roads already have high accident rates, an issue that these increased flows will only exacerbate. As well as the number of journeys increasing, the length of journeys will also increase as drivers divert onto the higher capacity Bypass route. In addition, there are concerns that the figures used in the modelling represent a conservative estimate of the situation as they were taken from a 2001 baseline position at the onset of the foot and mouth epidemic. It should be noted that all the figures quoted take into account future predicted growths in traffic.
9. It is the impacts of these increased traffic flows that directly impact on the majority of the other key issues as set out below. A summary of the significant traffic figures is set out in the Appendix.
10. **Landscape**
Officers consider it is inevitable that the proposed route for the Bypass will have a very intrusive impact on the Landscape of the National Park, since it will cross the generally south facing hill slopes above the settlements of Mottram, Hollingworth and Tintwistle. The general landscape proposals, both within and on the edge of the National Park, are not sufficiently varied or subtle enough to reflect the local landscape and agricultural character, this includes the works for a proposed roundabout at Townhead Farm. This major feature would adversely impact on the appearance and adjacent landscape setting of the Conservation Area within Tintwistle Village. The proposed false cuttings, viaducts, embankments and roadside tree planting will also accentuate the linear characteristics of the road when viewed from several locations within the National Park. Apart from the obvious scarring caused by a linear green-field site, the

related additional impacts of noise, air and light pollution will all contribute to an overall effect on the landscape quality of the area. There will also be significant landscape impacts within the Extended Area of Study, of particular concern is the loss of tranquillity as well as impacts upon landscape caused by the increase in high rise vehicles and predicted queuing over the Dark Peak area.

Plans and Policies

11. There is concern that the proposed scheme would conflict significantly with the Authority's key purposes as laid down in Section 5 of the National Parks and Access to the Countryside Act 1949. There is also little evidence that in exercising their functions, the Highways Agency have had regard to National park purposes as required by Section 11a of the 1949 Act. The *in principle* support that the Authority has given for the proposed scheme is based on General Strategic Policy 1: Development in the Peak National Park GS1 as set out in the Authority's Structure Plan, adopted in 1994. It is officers view that the scheme runs contrary to this policy. Finally, National Park Circular 12/96 and its proposed successor state that major development should not take place within a National Park except in exceptional circumstances. Such circulars are material considerations that need to be taken account of by the decision maker.

Proposed Scheme Objectives

12. Officers have four main areas of concern over the scheme's objectives;
- The proposed scheme does not sufficiently meet its overall aim which, is to reduce traffic flows in the villages. Figures indicate that the proposed scheme will only achieve a 15% reduction of traffic flow through Hollingworth.
 - The significant growth in traffic along the A628 is caused by transfer of traffic from the M62. This runs contrary to the aim of deterring the transfer of traffic from other cross Pennine routes onto the A628 in the National Park.
 - SPITS was developed as a package of integrated measures to be implemented at the same time or soon after the development of any proposed scheme. Although it fits one element of the SPITS strategy, namely improvements to the A57/A628/A616 core trunk road across the National Park, the proposed scheme conflicts with other core elements if as expected they are not implemented.
 - The scheme's objective of minimising the impact on the National Park has not been met. The significant extra traffic generated as a result of the proposed scheme has a severe impact on the Authority's first key purpose.

Access and Recreation

13. There are significant concerns about the access to amenity routes that cross the A628 and A6024 within the National Park caused by the increase in traffic flows. The impact on the main study area is limited, however, in the extended area this is of more concern, in particular, the impacts on the four national trails that cross the A628. This loss of access has the potential to impact upon the work undertaken by the Authority and its partners in implementing the CROW Act. All the crossings will require improvements in safety and signage, this runs contrary to National Park policies to reduce the visual impacts of signage upon the landscape.

Proposed Scheme Alternatives

14. Officers are concerned that alternatives including a lorry ban on the A628 and public transport improvements were not comprehensively assessed. These were considered in isolation and should have been considered together as a proposed alternative. A lesser scheme is referred to within the ES; however there is little justification within the documentation as to why this scheme was rejected.

Sustainability of the Proposed Scheme

15. The proposed scheme would be operating at capacity in its opening year. There is therefore concern that further measures will need to be put in place to relieve the congestion caused by the Bypass. Any future measures to upgrade the corridor would almost certainly have adverse impacts on the National Park and the designated SAC/SPA/SSSI areas. In addition, the 'pinching point' where the single carriageway meets the Bypass within the National Park is expected to cause considerable queuing within the National Park at peak periods having resultant detrimental impacts.

Air Quality

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

Noise and Vibration

17. It is difficult to assess these impacts upon the National Park as the methodology adopted (as prescribed by the Highways Agency) is designed for use in urban areas. The methodology does not allow one to make an assessment of the impacts on wildlife and tranquillity. The expected increase in noise caused by the higher traffic flows have two impacts; firstly, upon the biodiversity of the National Park and secondly on limiting the ability of people to enjoy the special qualities that the National Park provides.

Ecology

18. There are significant concerns about the potential impact of increased traffic, and in particular of air pollution, on the sensitive moorland habitats of the SAC/SSSI in the vicinity of the A628. There are also concerns over the direct losses and fragmentation of key habitats, including the majority of the heather moorland at Holybank Quarry, which falls within the Natural Zone. Approximately 260 metres of the proposed route passes through Section 3 & Natural Zone Moorland at Holybank Quarry. Linked to this loss are the associated concerns regarding the impacts on species. For example, bats (European Protected Species) are likely to be affected by direct destruction of roosting sites and substantial areas of associated sheltered feeding areas. In addition officers are concerned that the loss of and damage to existing heathland and heath/grass/rocky habitat mosaics is not adequately compensated for, either in terms of quantity or quality. Furthermore, the Authority has not been provided with sufficient information to assess the potential impacts of the proposed scheme on breeding birds across the extended study area.

Cultural Heritage

19. The increased traffic flows along the Bypass will have an impact on the conservation area status that covers the old part of Tintwistle, which lies within the boundary of the National Park. In addition, officers are still awaiting discussions with the Highways Agency on a number of key issues surrounding the mitigation of archaeological sites that lie within the National Park.

Geology and Soils

20. Information regarding mitigation of areas of contaminated land, albeit a small amount is still awaited. There is some concern over the presence of invasive species within the topsoil and the resultant impacts on habitats within the National Park over its re-distribution across the construction site.

Road Safety

21. There is considerable concern over the forecasted increase in traffic on the A6024, which are expected to increase by 116% in 2010. This road currently has an accident rate of 62 per hundred million vehicle kilometres, compared to a national average of 50. The forecasted increases can only compound the problem.

22. The proposed scheme has generated considerable interest from local groups and individuals. The Authority has received 224 letters about the scheme since August 2005, the majority of which are in response to a campaign organised by CPRE into the implementation of a HGV ban. Of these letters, most have come from people living alongside the A628/A57 although some have come from addresses outside the National Park boundary.

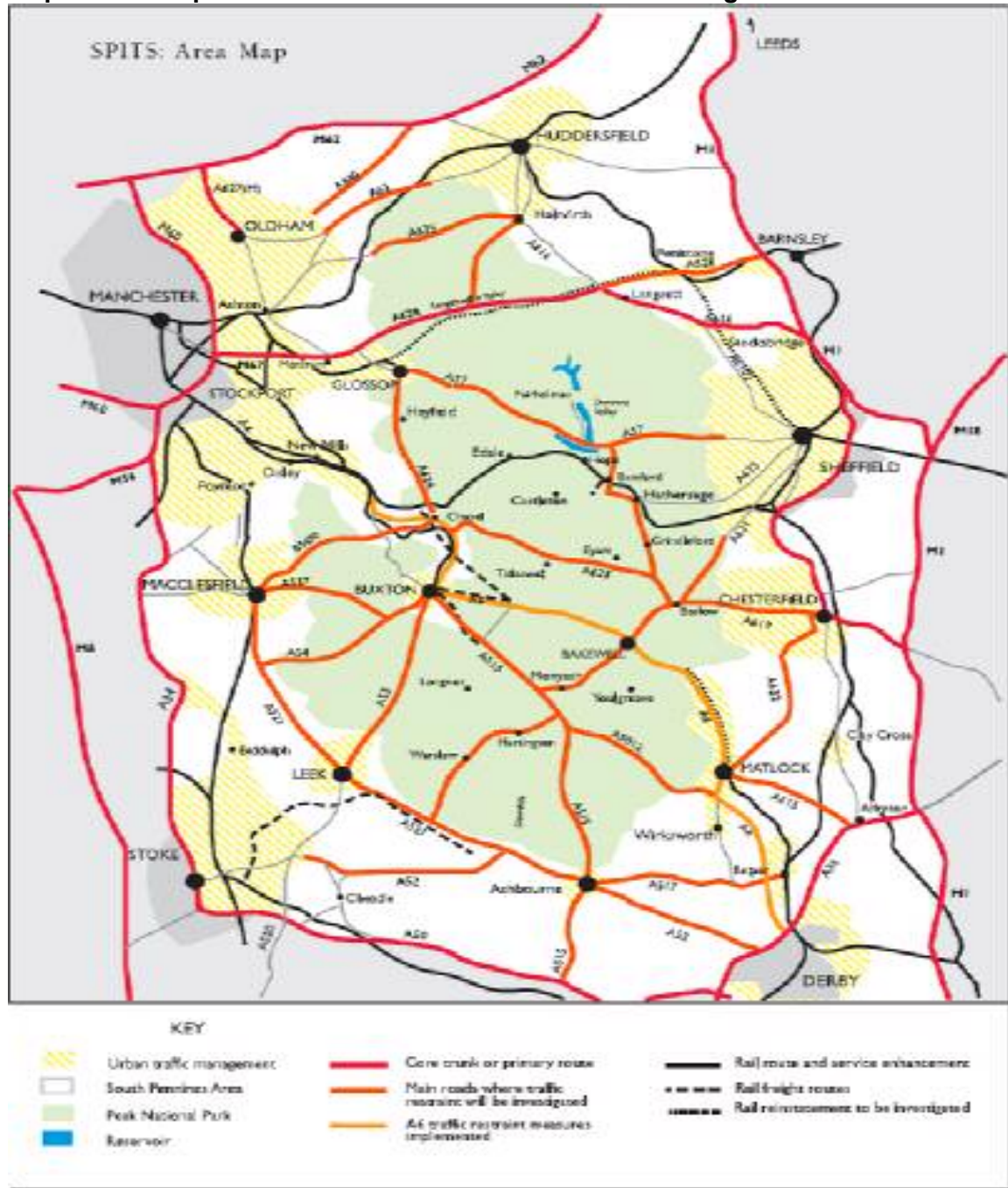
APPENDIX

Background

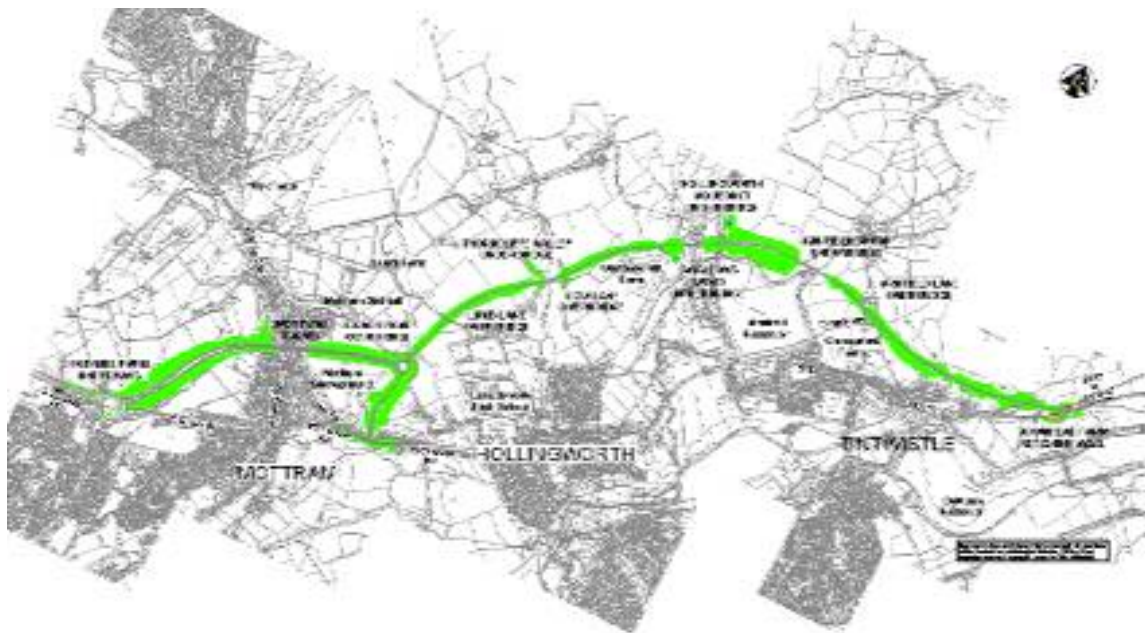
23. A comprehensive and detailed analysis of the impacts of the proposed scheme upon the National Park is contained within the Authority's proposed submission to the Highway's Agency (see list of background papers for obtaining copies of this submission)

Maps indicating the location of the proposed scheme are set below

Map 1: The Proposed Scheme in relation to the surrounding road network



Map 2: The Main Area of Study (incorporating the proposed scheme)



24. The following diagrams provide information on flows of traffic across key roads within the National Park on the basis of flow measurements taken in 2001 and those predicted in 2010 and 2025 respectively. The 'do minimum' option represents traffic flows in 2010 with no improvements and the 'do something' represents traffic flows if the proposed scheme is implemented.

Figure 1: Flows of traffic across the National Park between 2001 and 2010

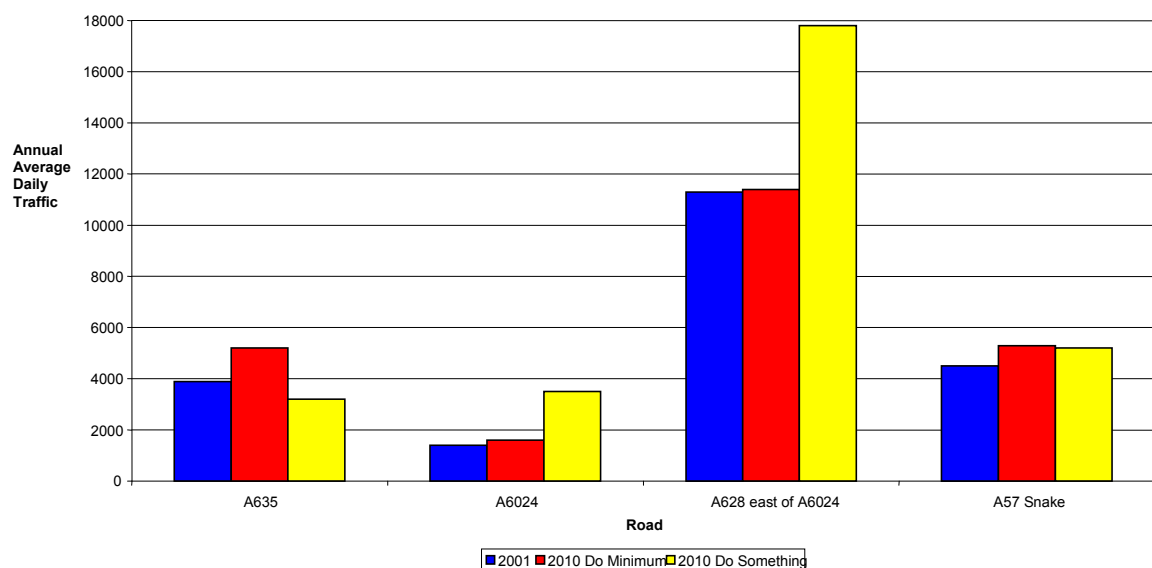
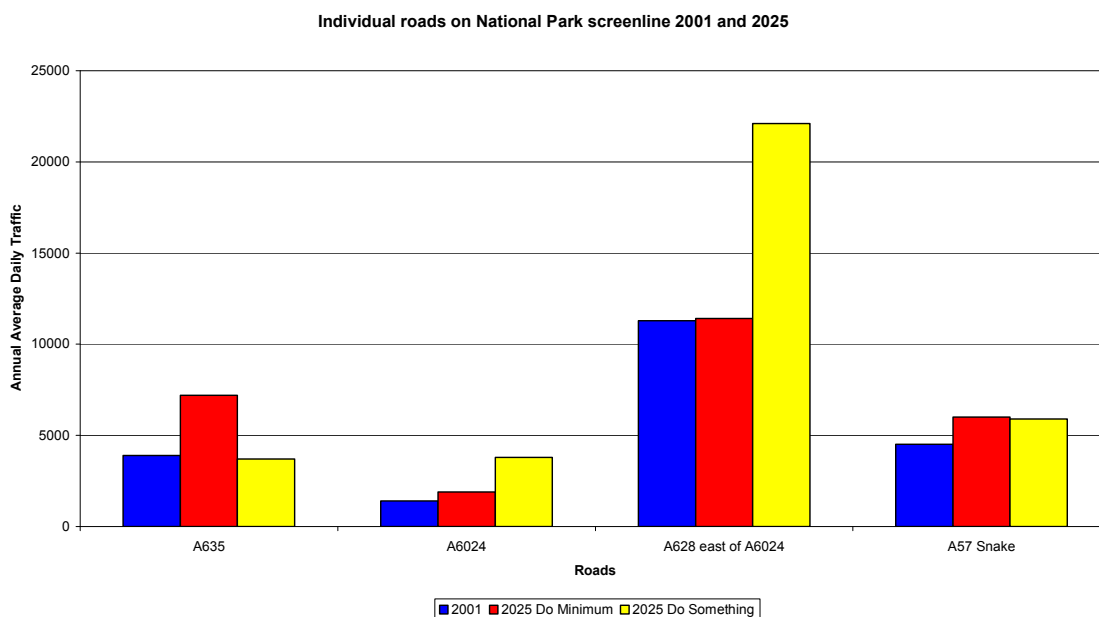


Figure 2: Flows of traffic across the National Park between 2001 and 2025.



Resources

25. There are likely to be financial implications in relation to representation at the Public Inquiry. Full details of this Inquiry, its timing and length, will not be made available until after the closing date of representations on May 5th 2006. However, indicative figures for employing appropriate counsel over an eight week Inquiry would be in the region of £57,000

Risk Management

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

Confidentiality – Due to the sensitive nature of the Authority's relations with SPITS partners the Authority has ensured that all key correspondence covering the Authority's response has always been headed as 'confidential'. In addition, the SPITS project officer has not been party to confidential discussions. The project manager has monitored and enforced this throughout.

Human Rights, Equalities, Health & Safety

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

Consultees

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

Enclosures

29. None

List of Background Papers (not previously published)

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

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