

By email to: [A57LinkRoads@planninginspectorate.gov.uk](mailto:A57LinkRoads@planninginspectorate.gov.uk)

12 January 2022

Dear Sir/Madam

**Campaign for National Parks (Unique Reference number: 20029526) response to Written Questions on A57 Link Roads Scheme (TR010034)**

Here are our responses to selected written questions on the A57 Link Roads Scheme.

**Q2.2 The NPPF has been updated since the application was submitted. a) How do the revisions of the NPPF affect the Proposed Development and the ES?**

The recent updates to the NPPF include changes to paragraph 176 which sets out the presumption against major development in designated landscapes. The new text makes it clear that protection against the negative impacts of major development also applies to the settings of National Parks and AONBs, and states that development within these areas “should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”. This revision affects the Proposed Development as it is within the setting of the Peak District National Park and means that it is now even more inappropriate for National Highways to be proposing a major development in this location.

**Q3.12 Various parties have suggested that an alternative to the Proposed Development would be a ban on heavy commercial vehicles on the A628 Woodhead Road and A57 Snake Road. The Applicant has provide further comments on this alternative scheme. Do you have any further comments in regard to National Highways’ comments?**

National Highways has failed to scrutinise alternatives that would avoid all the adverse impacts of the Proposed Development on the Peak District National Park. De-trunking of the A628T corridor with a Park-wide ban on through traffic of heavy lorries, substantial improvements for safe walking and cycling, and for buses throughout Glossopdale and Longdendale would reduce traffic and carbon emissions and allow people to travel without needing a car. The ban on through traffic of HGVs scored well in the 2015 Feasibility Study of Trans-Pennine Routes but was not progressed as it was ‘*deemed undeliverable*’.

**Q5.14 Is the Peak District National Park Authority content with the assessment of indirect effects on the Peak District National Park?**

The Proposed Development would result in both direct and indirect effects on the National Park as a result of the new infrastructure and increased traffic in the setting of the National Park.

All public bodies have a duty to take account of the potential effect of their decisions and activities on National Park purposes, including activities undertaken outside National Park boundaries which

may affect land within them (as set out in section 62 of the Environment Act 1995). National Parks' statutory purposes as set out in the Environment Act 1995 are:

- to conserve and enhance natural beauty, wildlife and cultural heritage; and
- to promote opportunities for public enjoyment and understanding of their special qualities.

This means that National Highways should be seeking to conserve and enhance the National Park and its setting through all of its activities including its plans for the Proposed Development. High volumes of traffic already have a negative impact on the tranquillity and natural environment in some parts of the Peak District National Park. Allowing the Proposed Development to go ahead will only increase these negative impacts so is completely inappropriate.

These statutory requirements are backed up by a range of national and local policy documents, including the National Planning Policy Framework; the National Policy Statement for National Networks; English National Parks and the Broads: UK government vision and circular 2010<sup>1</sup>; and the PDNPA Core Strategy and Development Management Policies<sup>2</sup>. The Government has also emphasised the additional planning protection for National Parks in the 25 Year Environment Plan<sup>3</sup> (page 57) alongside strong support for greater enhancement of our landscapes.

Specifically, paragraph 5.152 of the National Policy Statement for National Networks states that "there is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty." Increasing trunk road traffic through the Peak District National Park is clearly contrary to this policy and by proposing a scheme which will result in increased traffic National Highways is failing in its duty to have regard to National Park purposes.

The Proposed Development will result in significant increases in traffic on trans-Pennine routes through the Park including up to 38% on the A57 Snake Pass with associated increases in traffic accidents. There would also be increases in carbon emissions, undermining the NPA's commitments to supporting low carbon travel as set out in their current Management Plan, and national commitments to net zero transport as set out in the Transport Decarbonisation Plan<sup>4</sup>.

The new infrastructure and increased traffic resulting from the Proposed Development will also have a negative effect on the landscape character in the setting of the National Park, both as a result of the intrusion of new features such as signage and night-time lighting and through the loss of existing features such as hedgerows. It will also result in increased noise and reduced tranquillity and will thus have a negative impact on the special qualities of the National Park.

Yours faithfully



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