

# **A57 Link Roads Scheme DCO Application**

**Representation and response on behalf  
of the Peak District National Park  
Authority to the Examining Authority's  
third set of written questions (issued 6<sup>th</sup>  
May 2022)**

**Produced by the Peak District National Park  
Authority (May 2022)**

**Submitted 11<sup>th</sup> May 2022 (Deadline 11)**

Application by Highways England for an Order Granting Development Consent for A57 Link Roads

The Examining Authority's third set of written questions – Issued on 6<sup>th</sup> May 2022

Response on behalf of the Peak District National Park Authority.

1.	<b>The draft Development Consent Order (dDCO) and other consents</b> Reference is made to the dDCO submitted by the Applicant for Deadline 9 [REP9-004].		
1.2.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Requirements 3(3), 3(4), 3(5) and 3(6) Detailed design	The Applicant [REP9-004] has incorporated the ExA's [PD-016] suggested additions. Tameside Borough Council [REP9-037] had no comments.  <b>a) Please could Derbyshire County Council, High Peak Borough Council and Peak District National Park Authority comment?</b>  The Peak District National Park Authority welcomes the incorporation of the ExA's suggested additions at Requirements 3(3), 3(4), 3(5) and 3(6) – Detailed Design  <b>b) Do the local authorities or Peak District National Park Authority have any outstanding concerns regarding Requirement 3?</b>  The Peak District National Park Authority has no outstanding concerns regarding Requirement 3 – Detailed Design.
1.12.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b> Environment Agency Natural England	Remaining concerns	<b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, the Environment Agency, and Natural England summarise any remaining concerns that they have about the dDCO?</b>  The Peak District National Park Authority has no remaining concerns about the dDCO.
2.	<b>General matters</b>		
2.3.	Applicant Tameside Metropolitan	Remaining concerns	<b>Apart from the issues covered elsewhere in these third written questions or in their signed Statements of Common Ground, please could Tameside Metropolitan Borough</b>

Borough Council  
Derbyshire County Council  
High Peak Borough Council  
Environment Agency  
Natural England

**Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, the Environment Agency, and Natural England summarise any remaining concerns that they have about the:**

- **Case for the Scheme [REP2-016]**

The Peak District National Park Authority believes that the assessment made in the Case for the Scheme [REP2-016] with regard to tranquillity within the National Park is inaccurate. In paragraph 7.13.5, the applicant states that: -

*“Several arterial traffic routes already pass through the NCA including Woodhead Road (A628), Snake Road (A57) and Glossop Rd (A624). It is likely that the flow of traffic on the routes, and numbers of vehicles, are subject to variation, between seasons, hour of the day and day. Noise and movement on these routes is constant and easily perceptible. The effects of these existing roads undermine the tranquillity and wildness of the PDNP and landscape character area.”*

The National Park Authority accepts that the high levels of traffic on the A628(T) Woodhead Road already delivers a fairly constant hum of noise and regular visual disturbance as stated within our Deadline 9 submissions. We do not however believe that this justifies worsening this effect in any way.

In the case of the A57 Snake Pass. Current levels of traffic are relatively low (3,050 AADT – source Appendix 2.1 of the Environmental Statement). This means that currently there can be relatively long periods in which traffic does not negatively impact on the quiet enjoyment of the National Park or its tranquillity. With the scheme, there is a predicted 38% increase in average daily traffic flows along the route.

In paragraph 7.13.15 [REP2-016], the applicant states: -

*“There would be a traffic change through the PDNP as a result of the Scheme, however, these changes vary depending on the route and the time of day. It is not considered that there would be any significant indirect effects to the landscape character or visual amenity within the PDNP due to these traffic changes.”*

The National Park Authority believes that an increase in traffic flows of this nature will be detrimental to the tranquillity of the area and the quiet enjoyment of the National Park by its residents and visitors.

- **Environmental Management Plan (First Iteration) [REP9- 008]**

- **Register of Environmental Actions and Commitments [REP9-009]**

The Peak District National Park Authority has no remaining concerns with regard to the Register of Environmental Actions and Commitments [REP9-009], beyond those previously expressed regarding indirect impacts of the scheme on the National Park.

- **Works Plans [REP9-002], Streets, Rights of Way and Access Plans [REP9-003], Scheme Layout Plans [REP8- 004], and Engineering Drawings and Section Plans [REP5-005]**

The Peak District National Park Authority has no remaining concerns with regard to the Works Plans [REP9-002], Streets, Rights of Way and Access Plans [REP9-003], Scheme Layout Plans [REP8- 004], and Engineering Drawings and Section Plans [REP5-005]

- **compliance of the Proposed Development with relevant legislation and policy, including local policies**

During the Examination, the Peak District National Park Authority has expressed concerns about the Applicant's consideration of the role of the National Planning Policy Framework and its requirements in regard to the Peak District National Park.

We also believe that the delivery of the scheme will have indirect, but negative effects on the National Park. These effects are predicted to occur not only on the Strategic Road Network, but on local roads, with our principle concern being in relation to the A57 Snake Pass. In effectively disregarding the albeit indirect negative impacts of the scheme on the National Park, we believe that the applicant is not fulfilling its statutory duty under Section 62 of the Environment Act, to have regard to National Park purposes. This duty applies to works undertaken either on land within a national park, or which affects land within a national park.

CPRE Peak District and South Yorkshire submitted a letter to the Examining Authority at Deadline 10. The letter, which was submitted on behalf of number of bodies and individuals who have appeared at the Issue Specific Hearings and / or made written representations to the Examination. The letter raises concerns about the evidence base used in support of the scheme. It further suggests that issues with the evidence base cast doubts on the scheme's adherence to "*the Planning Act 2008, the 2017 EIA Regs and Guidance, National Highways Licence agreement, Transport Decarbonisation Plan, Bus Back Better, Gear Change, Greater Manchester Right Mix policy, WebTAG Appraisal, IEMA guidance and NPSNN*".

			<p>The Peak District National Park Authority is not in a position to be able to comment directly on the validity of the points raised within the letter. However, in the interests of ensuring that the application is fully compliant with the relevant legislation and policy, we would be keen to see evidence from the applicant to ensure that the concerns of CPRE Peak District and South Yorkshire et al are addressed.</p> <ul style="list-style-type: none"> <li>• <b>any other important and relevant matters, including in relation to the ExA's Initial Assessment of Principal Issues [PD-005]</b></li> </ul> <p>The Peak District has no additional important or relevant matters that have not already been covered in our previous written and verbal representations.</p>
<b>3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders</b>			
3.11.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority and summarise any remaining concerns that they have about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?</b></p> <p>The Peak District National Park Authority remains concerned about the impact of additional traffic flows on National Park roads as a result of the scheme. We are concerned about the impact of additional traffic flows on the amenity of users of public rights of way and walking, cycling and horse-riding routes of National importance.</p> <p>As referred to in previous representations, crossing conditions for routes on the A628 (T) including the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail are challenging under the current levels of traffic. Additional traffic flows arising from the scheme will only serve to worsen the situation.</p> <p>On the A57 Snake Pass, there are a number of walking routes that are separated for some distance and the only links between them are through road / verge walking. Again, even with existing levels of use this is an unpleasant experience, with traffic often passing close to vulnerable users and at relatively high speeds (the road has a 50mph speed limit). The geography of the road, undulating with tight bends and limited verges and roadside stone walls makes this an unwelcoming environment for those linking footpaths / bridleways. A 38% increase in traffic will worsen conditions for vulnerable users. The A57 Snake Pass is a</p>

			<p>popular route for road cyclists and they will also be negatively affected by the predicted increase in traffic.</p> <p>It is worth noting that the A628(T) is subject to two very challenging junctions: -</p> <ul style="list-style-type: none"> <li>i) The junction between the A628 and the A6024 (Holme Moss) road</li> <li>ii) The junction between the A628 and the B6105 (Devil's Elbow) road</li> </ul> <p>Both of these junctions feature acute angles and poor levels of visibility in at least one direction for those joining the A628. This makes left turns hazardous (the centre line is often crossed) and right turns extremely problematic. In particular, visibility for right turners from the A6024 onto the A628 necessitates crossing the east-bound lane to obtain a sufficient view eastward of on-coming westbound traffic.</p> <p>The up-to almost 1,000 vehicles per day increase along the A628 will worsen this situation.</p>
<b>4.</b>	<b>Peak District National Park</b>		
4.2.	<b>Peak District National Park Authority</b>	The regard given to Statutory Purposes	<p><b>Please could Peak District National Park Authority comment on the Applicant's response [REP9-027] to their written summary of oral submissions regarding Peak District National Park [REP8-026]?</b></p> <p><b>9.79.9</b> – There appears to be a lack of agreement between the applicant and National Park Authority with regard to the relevance of the National Planning Policy Framework and the Environment Act to this application [REP9-027].</p> <p>To provide some element of clarity, the Peak District National Park Authority's reference to the requirement for "<i>great weight</i>" is taken from Paragraph 176 of the National Planning Policy Framework (2021); rather than in relation to Section 62 of the Environment Act (1995) / Section 11 of the National Parks and Access to the Countryside Act (1949); and in regard to the Sandford principle.</p> <p>Paragraph 176 of the National Planning Policy Framework (2021) states that: -</p> <p><i>"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. The scale and extent of</i></p>

			<p><i>development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas is to be given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park</i></p> <p>The Peak District National Park Authority believes that the NPPF is relevant to this application and that therefore, 'great weight' should be accorded to the National Park.</p> <p>The applicant states that Section 62 of the Environment Act (1995) is wrongly quoted by the National Park Authority [REP9-027]. We disagree, the Section 62 Duty to have regard to National Park purposes applies to National Highways and their agents.</p> <p>It should be noted that the Memorandum of Understanding between Highways England and National Parks England states: -</p> <p><i>“Highways England has a statutory duty under Section 62 of the Environment Act (1995) to have regard to National Park purposes when carrying out work affecting land within a National Park and its setting. This duty also applies to any agents acting on behalf of Highways England”<sup>1</sup></i></p> <p>The wording of this Memorandum of understanding was authored and agreed by representatives of both Highways England and National Parks England.</p> <p>In proposing a scheme whose indirect effects are predicted to worsen conditions for sensitive receptors, without proposing associated mitigation or enhancement, we believe that applicant is falling short of this duty.</p> <p><b>9.79.10</b> – As described above, the reference to <i>“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks”</i> comes from Paragraph 176 of the National Planning Policy Framework (2021) rather than in reference to the Sandford principle.</p> <p>We believe that the NPPF is relevant to this application and that therefore, 'great weight' should be accorded to the National Park.</p>
4.4.	Natural England <b>Peak District National Park Authority</b>	Remaining concerns	<b>Apart from the issues covered elsewhere in these third written questions, please could Natural England, Peak District National Park Authority, Derbyshire County Council, and</b>

	Derbyshire County Council High Peak Borough Council		<p><b>High Peak Borough Council summarise any remaining concerns that they have about the Applicant's consideration of the Peak District National Park?</b></p> <p>As stated throughout this Examination, the Peak District National Park Authority's principle concern rests on the indirect effects of the proposed scheme on the Peak District National Park and its Special Qualities.</p> <p>Fundamentally, we do not believe that these impacts have been adequately assessed or understood by the applicant or agents acting on their behalf. With regard to the sensitivity of the landscape and its receptors, the change in consultants mid-way through the scheme development halted what appeared to be a constructive dialogue on how best to approach this assessment. Engagement with the subsequent consultants proved less so in this matter, with a more rigid and less helpful approach being adopted.</p> <p>Unfortunately, this has left the National Park Authority with concerns about the assessment of the indirect impacts of the scheme on sensitive landscape receptors.</p>
<b>5. Other landscape and visual, design, Green Belt</b>			
5.1.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Landscape and visual Mitigation	<p><b>The Applicant [REP9-027] has updated the Outline Landscape and Ecological Management and Monitoring Plan [REP8-014] and Design Approach Document [REP9-008 Annex C2] in response to concerns raised by the local authorities regarding planting.</b></p> <p><b>a) Do the local authorities and Peak District National Park Authority have any comments on the Applicant's updates?</b></p> <p>The Peak District National Park Authority has no comments on the Applicant's updates.</p> <p><b>b) Do the local authorities or Peak District National Park Authority have any remaining concerns about the Outline Landscape and Ecological Management and Monitoring Plan?</b></p> <p>The Peak District National Park Authority has no remaining concerns about the Outline Landscape and Ecological Management and Monitoring Plan.</p>



5.2.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council	Design Mitigation	<p><b>The Applicant [REP9-027] has updated the Design Approach Document [REP9-008 Annex C2] in response to concerns raised by High Peak Borough Council [REP8-025] regarding references to local policy.</b></p> <p>a) Does High Peak Borough Council have any comments on the Applicant's updates?</p> <p><b>b) Do the local authorities or Peak District National Park Authority have any remaining concerns about the Design Approach Document</b></p> <p>The Peak District National Park Authority submitted comments on the Designs Approach Document at Deadline 8; we have no additional concerns.</p>
5.4.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of landscape, visual, design, or the Green Belt?</b></p> <p>The Peak District National Park has no further concerns about the Applicant's consideration of landscape, visual, design, or the Green Belt. Our concerns are related to the indirect impact of increased traffic flow on the sensitive receptors of the Peak District Landscape and its enjoyment. Those concerns have been expressed elsewhere within this document and within the majority of our previous written and oral submissions to this Examination.</p>
<b>6.</b>	<b>Other noise, vibration, and nuisance</b>		
6.2.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b> Environment Agency	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, and the Environment Agency summarise any remaining concerns that they have about the Applicant's consideration of noise, vibration, common law nuisance or statutory nuisance?</b></p> <p>As expressed within our previous representations, the Peak District National Park Authority is concerned about the indirect impact of increased traffic flow on the peace and tranquillity of the National Park; and the quiet enjoyment of its Special Qualities. We have no further concerns that have not been expressed previously.</p>
<b>7.</b>	<b>Air Quality</b>		

7.2.	Tameside Metropolitan Borough Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of air quality?</b></p> <p>In our previous representations, the Peak District National Park Authority has expressed concerns about the impact of the scheme on the Tintwistle AQMA and through the deposition of NOx on the SAC. We have nothing additional to add to our previous comments.</p>
<b>8.</b>	<b>Climate Change</b>		
8.2.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of climate change?</b></p> <p>In our previous representations, the Peak District National Park Authority has expressed concerns about the impact of the scheme on Climate Change. We have nothing additional to add to our previous comments.</p>
<b>9.</b>	<b>The Historic Environment</b>		
9.1.	Applicant <b>Peak District National Park Authority</b>	Tintwistle Conservation Area	<p><b>The Applicant [REP9-027] considers that there would be no perceptible change to the character, appearance or noise environment of the conservation area due to the very slight increase in traffic/ key attributes of setting which contribute towards significance would be persevered.</b></p> <p><b>Peak District National Park Authority [REP8-026] have remaining concerns about indirect effects on Tintwistle Conservation Area.</b></p> <p><b>Please could the Applicant and Peak District National Park Authority seek to agree on the assessment, any necessary mitigation, and how it is secured, and each provide a coordinated response?</b></p> <p>The Peak District National Park Authority submitted comments to National Highways on 03 May 2022 to be included in the Statement of Common Ground (SoCG) on this matter. In summary, our comments stated that we have concerns that the language of the EIA impact assessment does not tie in completely with the language of the NPPF (and new terminology was introduced. i.e. 'minimal harm' which should be the lower end of 'less than substantial</p>

			harm'), and that this is linked to their wider concerns that relate to the methodology for assessing tranquillity is flawed. The Applicant maintains that their approach to assessing the conservation areas is in accordance with DMRB LA 106, which is industry best practice and the assessment approach is proportionate, appropriate and consistent with the assessments undertaken for comparable highways DCO applications. With this in mind, it is not possible for the Peak District National Park Authority and National Highways to reach agreement on the assessment, and in the SoCG this issue is 'not agreed'.
9.4.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of the historic environment?</b></p> <p>The Peak District National Park Authority has previously expressed its concerns regarding the impact of the scheme on the historic environment within our previous representations. Apart from the issue covered above and previous concerns expressed, we have no remaining concerns.</p>
<b>10.</b>	<b>Soils, ground conditions, material assets and waste</b>		
10.5.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b> Environment Agency	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, and the Environment Agency summarise any remaining concerns that they have has about the Applicant's consideration of soils, ground conditions, material assets or waste?</b></p> <p>The Peak District National Park Authority has not expressed any concerns about the effect of the scheme on Soils, ground conditions, material assets and waste. We have no concerns in relation to this topic area.</p>
<b>12.</b>	<b>Biodiversity, ecological and geological conservation, Habitat Regulation Assessment</b>		
12.9.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, Natural England, and the Environment Agency summarise any remaining concerns that they have about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?</b></p>

	Natural England Environment Agency		<p>The Peak District National Park Authority has raised a number of concerns throughout the Examination in relation to biodiversity, ecological and geological conservation, Habitat Regulation Assessment. These concerns have included those related to air quality impact on Blanket Bog, noise and visual disturbance to birds, Mountain Hare roadkill.</p> <p>The above items remain of concern to the National Park Authority; however, we do not have any additional concerns.</p>
<b>13.</b>	<b>Land use, social and economic, human health</b>		
13.1.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b>	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of land use, social and economic, or human health?</b></p> <p>The Peak District National Park Authority has no additional concerns under Land use, social and economic, human health that have not been raised either elsewhere within this document or as part of our previous written and oral representations to this Examination.</p>
<b>14.</b>	<b>Other environmental topics</b>		
14.1.	Tameside Metropolitan Borough Council Derbyshire County Council High Peak Borough Council <b>Peak District National Park Authority</b> Environment Agency Natural England Statutory Undertakers	Remaining concerns	<p><b>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, the Environment Agency, Natural England, and Statutory Undertakers summarise any remaining concerns that they have about the Applicant's consideration of:</b></p> <ul style="list-style-type: none"> <li>• <b>the utility infrastructure</b></li> <li>• <b>transboundary effects</b></li> <li>• <b>security</b></li> <li>• <b>major accidents and disasters</b></li> <li>• <b>civil and military aviation and defence</b></li> <li>• <b>decommissioning</b></li> <li>• <b>cumulative and combined effects</b></li> <li>• <b>other important and relevant considerations</b></li> </ul>

As stated elsewhere, the Peak District National Park Authority's primary concern remains the indirect impact of the scheme (through increased traffic flows) on the National Park. Whilst indirect, these effects are largely negative, worsening conditions across a range of receptors; principally along the A628(T) and A57 Snake Pass corridors. Each impact has been assessed by the applicant as being minor or negligible. However, we do not believe that the sensitivity of receptors within the National Park has been robustly assessed. We are also mindful that these indirect effects impact the special qualities of the National Park at a range of different levels.

For example, the A57 Snake Pass will experience a perceptible change in traffic noise, an increase in emissions including NOx, greater visual disturbance, greater severance. All of these impacts are to sensitive receptors. In combination, they are likely to affect the designated sites and their wildlife, as well as negatively affecting the quiet enjoyment of the National Park's residents and visitors.

The Special Qualities of National Parks are given extremely high levels of protection by UK Law to prevent those qualities being adversely affected by development. We believe that in this case, the proposed scheme will damage those qualities. Therefore, we would wish to see either changes to the scheme to address this; or measures introduced to mitigate damage to or enhance the Special Qualities of the National Park.

For clarity, the Special Qualities differ between the different National Parks. In the case of the Peak District National Park, these are defined within the Peak District National Park National Park Management Plan (2018-23)<sup>2</sup>. These special qualities are: -

- Special quality 1: Beautiful views created by contrasting landscapes and dramatic geology;
- Special quality 2: Internationally important and locally distinctive wildlife and habitats;
- Special quality 3: Undeveloped places of tranquillity and dark night skies within reach of millions;
- Special quality 4: Landscapes that tell a story of thousands of years of people, farming and industry;
- Special quality 5: Characteristic settlements with strong communities and traditions;
- Special quality 6: An inspiring space for escape, adventure, discovery and quiet reflection; and
- Special quality 7: Vital benefits for millions of people that flow beyond the landscape boundary.

			<p>The geographical area that is negatively affected by the indirect impacts of the scheme encompasses all of the above Special Qualities to a greater or lesser extent. We would suggest that Special Qualities 1, 2, 3 and 6 are of particular relevance in relation to this and earlier representations made by the Peak District National Park Authority.</p> <p>We would suggest that it is incumbent on the Applicant to demonstrate how they have had regard to National Park purposes and the benefits and impacts of the scheme on the National Park's Special Qualities. We would also request that the Applicant demonstrate how the effects of the scheme on those Special Qualities have been determined and measured.</p> <p>As stated previously, there may be measures that could provide mitigation of negative impacts or enhance the Special Qualities of the National Park. However, this is dependent on a full understanding of what the impacts are and what measures may be available. Any such measures would need to be agreed with the Peak District National Park Authority.</p> <p>The Peak District National Park Authority remains open to dialogue with the Applicant in order to address this issue.</p>
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