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Dear Tim,

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Trans-Pennine Feasibility Scope Document April 2014

We are writing to express our deep concern about the scope of the trans-Pennine Feasibility Study. In summary, the objectives are still not objectives, but actions; the scope of the study has narrowed from trans-Pennine to '*connectivity between Manchester and Sheffield*', with the M62 still excluded from the geographical scope; and the policy approach towards the National Park has not been adopted correctly. Finally, whilst we appreciate that the removal of the word 'infrastructure' qualifying solutions/proposals suggests a broader modal approach the study remains firmly road based.

At the meeting on 3 February and through a follow-up letter the Friends and CPRE addressed all these issues and we do not intend to rehearse the arguments again. However, the objectives, the geographical scope and the approach towards the National Park are absolutely crucial to the outcome of the study, and we therefore expand on our reasoning behind our concerns.

Objectives for the study

The draft objectives still do not make explicit the outcomes the study is seeking but remain vague about addressing existing and future problems and improving connectivity. What are the problems along the route? The scope document refers only to it being one of '*the most notorious and long-standing road hot spots in the country*', inclement weather (about which nothing can be done), a high and exposed carriageway, poor performance compared with links between Sheffield and Leeds or Leeds and Manchester; and a high volume of traffic on the A628/A57, the majority of which is generated by Glossop-Greater Manchester, not trans-Pennine, movements. As we said previously the problems along the route are complex and the objectives to address them need formulating clearly. Is the study aiming to improve air quality, the environment of the National Park and/or the villages, the opportunities for alternative modes to car and HGV, or to reduce the collision rate and severity? And improving connectivity - what does that mean and for whom? Until the objectives are explicit the study will fail to make an objective appraisal and may overlook potential solutions.

President: Julia Bradbury

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire
for the countryside, for communities, for the future

For example, as we propose below, the protection and enhancement of the National Park must be a core objective for the Feasibility Study. In order to achieve that a package of sustainable transport measures that reduces cross-Park traffic is required. HGVs crossing the Park create a considerable adverse impact and could be diverted off the A628T and onto the motorway network around the Park using a weight restriction. Alternatively, the A628T could be de-trunked and a local charging scheme applied. MTRU (Metropolitan Transport Research Unit) who undertook a more detailed assessment of removing the HGVs from the A628T concluded that *'the benefits of such a proposal would justify the costs even without taking the special quality of the area into account. In these circumstances a more detailed proposal should be worked up for assessment and consultation'*¹. We urge DfT to clarify the study objectives in order that potential sustainable solutions such as this are not overlooked.

M62 must be included in the scope of the trans-Pennine study

The M62 must be included in the scope of the trans-Pennine study because of the close interaction between it and the A628T. The general public, from commuters and lorry drivers to holiday makers, frequently make choices of route between the A57, the A628T and the M62, as witnessed by a number of on-line forums². The Highways Agency is well aware of this interaction. It included the M62 in the traffic modelling assessment of the A57/A628T Mottram-Tintwistle bypass in 2007 and made the relationship between the routes explicit through its A57/A628/A616 Strategy Summary (attached) sent to us following a FoI request in 2010. In paragraph 1.3 of this document the inter-relationship between the routes is made plain.

'The route (A628T) caters for the distribution of local traffic as well as being an important national route for strategic long distance east-west journeys, as it is an alternative trans-Pennine route to the M62 for traffic in the south of the NW and Y&H regions'; and again in para 2.1 *'the route provides a strategic alternative to the M62 crossing of the Pennines'*.

The interaction of traffic with the two routes also complicates traffic management on the A628T. Currently traffic flows along the route have remained stable over the last 20 years because of the constraints within the villages of Mottram and Hollingworth. In 2007 the Highways Agency traffic modelling for the Mottram-Tintwistle bypass found that bypassing that constraint increased traffic by 40% along the A628T, of which a substantial proportion was due to drivers changing route from the M62³. It is therefore essential that, as well as the A57, the M62 must be included in any study of trans-Pennine traffic.

National Park policy

We welcome the recognition of the National Park designation in the scope document but the National Planning Policy Framework 2012 (NPPF)⁴ is not guidance but policy. Furthermore, the scope document makes no mention of the presumption against major road building within the Park and for reduction of traffic impacts and removal of cross-Park traffic as in Defra's National Parks Circular⁵ and the Peak District National Park Authority's Core Strategy (adopted 2011). The South Pennines Route Based Strategy

¹ CPRE lorry control proposal on the A628; Assessment by MTRU, July 2005.

² <http://forums.moneysavingexpert.com/showthread.php?t=4225841>
<http://www.sheffieldforum.co.uk/archive/index.php/t-534261.html>
<http://singletrackworld.com/forum/topic/commuting-from-sheffield-to-manchester>
<http://www.trucknetuk.com/phpBB/viewtopic.php?f=2&t=107798>
<http://www.caravantalk.co.uk/community/topic/79271-woodhead-pass-a628/>
<http://www.trucknetuk.com/phpBB/viewtopic.php?f=2&t=94305>

³ A57/A628 Mottram Tintwistle Bypass and A628/A616 Route Restraint Measures Forecasting Report, Highways Agency, 2007

⁴ National Planning Policy Framework, para 115-116

⁵ English National Parks and the Broads, UK Government Vision and Circular, Defra 2010, para 85

(RBS) evidence report does acknowledge the Circular in para 2.7.16 and the A628 environment is recognised as of high priority and serious challenge (para 4.6.10). Despite this, we believe that the scope document of the Feasibility Study has not emphasised National Park statutory purposes, which must be fulfilled by statute, or the seriousness of the National Park designation. We re-iterate.

In order that all those engaged in the study appreciate the prime importance of the Peak District National Park, the study must spell out its statutory purposes⁶ which are:

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks; and
- to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.

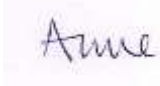
Section 62 of the Environment Act 1995 places a general duty on statutory undertakers, such as local councils on the Stakeholder Reference Group, the Highways Agency and DfT, to have regard to the purposes of National Parks when coming to decisions or carrying out their activities relating to, or affecting land within, the Parks.

With such statutory purposes the policy framework for the National Park is robust, as outlined previously, and informs the Highways Agency's A57/A628/A616 Strategy Summary quoted above. The document states that because of the nature of the route and the area through which it passes the operational regime is to promote the M62 as the preferred trans-Pennine route for HGVs, with safety as the number one priority. Although the M62 is signed as the alternative for trans-Pennine crossings if the A628T is closed, the A628T is deliberately not signed if the M62 is closed. The Highways Agency has '*taken into account the nature and setting of the route in the Peak District National Park and in doing so has minimised the impact of our operations on the environment.*' The Agency continues to discourage the route from becoming attractive to through traffic. In line with this strategy, the protection and enhancement of the National Park must be a core objective for the Feasibility Study.

Conclusion

In conclusion we urge you to reflect all these comments in the scope document. The speed with which this trans-Pennine Feasibility Study is being undertaken in advance of robust evidence and management of route (3.3.7) will make it impossible to undertake the necessary investigation in time to report this year. As we have already said, there are a number of solutions that could be applied immediately at low cost, and these should be implemented now to test their effectiveness.

Yours sincerely,



Anne Robinson
Campaigner

⁶ Section 11A of the 1949 National Parks and Access to the Countryside Act, as amended by Section 62 of the 1995 Environment Act