

A57 Link Roads

TR010034

**9.6 Comments on other written
submissions received after the
registration of Interested Parties closed
on 16 September 2021**

Rule 8 (1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads

Development Consent Order 202[x]

9.6 Comments on other written submissions received after the registration of Interested Parties closed on 16 September 2021

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1. Introduction

- 1.1.1. This document provides the comments of the applicant, National Highways, in response to the Additional submissions submitted after 16 September and the written submissions about how the application should be examined submitted at the Procedural Deadline on 1 November 2021 as requested by the Examining Authority at Deadline 1 in its Rule 8 letter dated 19 November 2021. Comments have been provided on the following documents:
- Historic England's Additional Submission (AS-001)
 - Christopher Hill's Additional Submission (AS-002)
 - Peter Simon's Additional Submission (AS-004)
 - CPRE Peak District and South Yorkshire's Written submission about how the application should be examined (PDL-002)
 - Peter Simon's Written submission about how the application should be examined (PDL-011)
- 1.1.2. National Highways has sought to provide comments where it is helpful to the Examination to do so. National Highways has not responded to every submission for instance, because the submission was very short, or because it contained expressions of opinion without supporting evidence. where National Highways has chosen not to comment this is not an indication National Highways agrees with the point or comment raised or opinion expressed.

2. Historic England's Additional Submission (AS-001)

- 2.1.1. *"We have had detailed pre-application discussion with Highways England regarding this scheme which spans our Midlands and North-West Regions. We have no objection to the grant of DCO, matters raised by us have or are being positively addressed. The submitted material reflects our positive engagement with the applicant and we look forwards to providing further technical advice as field investigations are completed and reported upon. We will be happy to memorialise our advice and position through a SoCG with Highways England."*

2.2. National Highways Response

- 2.2.1. National Highways welcomes Historic England's recognition of the positive progress on these matters and will continue to actively engage with Historic England in order to agree a Statement of Common Ground (as requested in the Examining Authority's Rule 6 letter of 19 October 2021).

3. Christopher Hill's Additional Submission (AS-002)

3.1. National Highways Response

- 3.1.1. National Highways has provided a response to Mr Hill separately. Given points raised relate to financial negotiations in respect of Mr Hill's property, National Highways does not propose to submit the response into the examination. However, National Highways remains committed to engaging with Mr Hill over this matter.

4. Peter Simon's Additional Submission (AS-004)

- 4.1.1. *I seek greater clarity regarding the derivation of the traffic model data, to assist my further written representation. Accordingly I submit this question of clarification to the Examination Preliminary Hearing.*
- 4.1.2. *"It is not clear what percentage of the promoter's modelled traffic data accounts for that generated by the "committed developments" (ES 6.4 Figure 15.1). Can the promoter Highways England please supply that figure both generally; and particularly with regard to the Glossop and High Peak figures? (HE Appendix 2.1 Inserts, 2, 3, and 11)."*

4.2. National Highways response

- 4.2.1. National Highways anticipates that there will be an issue-specific hearing covering traffic and transport, including traffic impacts on the local road network.
- 4.2.2. The traffic modelling undertaken for the assessment of the Scheme takes account of the available practical capacity of the road network.

5. CPRE Peak District and South Yorkshire's Written submission about how the application should be examined (PDL-002)

- 5.1.1. *We believe that there are a number of omissions to the DCO documents. We consider these to be basic to this sort of application and have been asking the applicant to supply much of the relevant information since March 2021. We have supplied a list (below) of documents that are outstanding to our requests for information but a key problem has been the complete lack of technical dialogue. As Mr Buchan said in his relevant representation the missing information is essential in the first instance to scrutinise the work supporting the scheme. Secondly, it would help us greatly in finalising and appraising better performing alternatives to the proposed scheme. The scrutiny point is important – in 2007 a scheme was abandoned after serious flaws were found in the modelling. When would be the appropriate time to raise these omissions in the examination process?*

List of Omissions

1. *Normal Transport Appraisal documentation compliant with by WebTAG and the Treasury 5 Case model*
2. *Transport modelling and forecasting documentation, including a model validation report (LMVR) for either the SATURN or local models (e.g. VISSIM) or any other validation and calibration information*
3. *Detail of the TUBA outputs underlying the economic and environmental cases*
4. *Origin and destination of traffic*
5. *Carbon assessment worksheets*
6. *Information not available in the Transport Assessment Report*
 - i. *What models were used in addition to SATURN for the junctions?*
 - ii. *What are the costs for signalling Junction 4 and what were the traffic impacts of doing this without the full scheme?*
 - iii. *The Transport Assessment states that variable demand modelling was undertaken through Diadem but there are many options:*
 - a. *Which DIADEM elements were switched on and off?*
 - b. *How was walking and cycling included?*
 - c. *How was public transport included?*
 - d. *What are the forecasts or assumptions for the local modelled area (to also mode split transparent) for:*

Public transport (today – 2025 – 2040)

Cycling (today – 2025 – 2040)

Walking (today – 2025 – 2040)

Vii) Are the time savings in Figure 7.7 to the junctions at each end but not through it? Are there more details of real origin and destination pairs and zone to zone timings?

vii) Queue length data for key junctions?

7. With respect to the 2015 Trans Pennine Feasibility study Stage 2 report annex we requested:

- i. A list of the 'complementary sustainable measures' which the Department for Transport/ Highways England assessed in the addition to an HGV control scheme for the EAST'*
- ii. Any detail of the individual components or how they were assessed such as travel behaviour programmes, bus or cycle priority*

5.2. National Highways response

5.2.1. National Highways has provided a response to Mr Buchan and Ms Robinson of CPRE Peak District and South Yorkshire (CPRE PD & SY) in an email dated 12 November 2021. In the email, National Highways provided five documents in response to CPRE PD & SY's the list of information requested, namely the

- Combined modelling and appraisal report (ComMA)
- Transport Modelling Package
- Transport Forecasting Package
- Economic Appraisal Package (EAP)
- Carbon Toolkit

5.2.2. National Highways considers that this information responds to the list of information requested by CPRE PD & SY. With regards to point 4 National Highways has requested further clarification in order to provide the exact information and correct format CPRE PD & SY require.

5.2.3. National Highways and CPRE PD & SY have been in contact to schedule a meeting in December 2021 to discuss matters raised in their representations.

6. Peter Simon's Written submission about how the application should be examined (PDL-011)

6.1.1. *I understand the Inspector(s) ultimately decide which issues warrant "Issue Specific Hearings" partially on the basis of further submissions that are to be made. Also that interested parties may request such hearings orally at the Preliminary Hearing or in writing by a deadline of tonight.*

6.1.2. *I note that statutory parties including a County Highway Authority are perhaps most notably at variance with the proposed Application regarding the "effects on the local road network", with "holding objections" in place. (Principal Issues 2. c, d). So I wish to submit that this indicates a strong case for an Issue Specific Hearing on the matter.*

- 6.1.3. *As an interested party I perceive the Transport Assessment (Highways England 7.4) case for the scheme as relying heavily on the local transport network having the capacity to absorb additional traffic, an assumption which requires the most stringent of testing.*
- 6.1.4. *Accordingly I request here in writing the Inspector(s) consider at this stage and throughout the process the need to reserve an Issue Specific Hearing for these contentious issues; “local highway authorities concerns about the transport assessment” and “effects on the local road network”.*

6.2. National Highways Response

- 6.2.1. The traffic forecasts used for the assessment of the Scheme have been developed in full accordance with Department for Transport’s (DfT) Transport Analysis Guidance (TAG). Forecast traffic growth is based on factors derived from the DfT’s National Trip End model in combination with forecast changes in traffic volumes due to committed developments and schemes. The committed developments and schemes included in the traffic forecasts are those that are classified as more than likely or near certain to be implemented and listed as such in the project uncertainty log. Consequently, the National Highways transport assessment of the Scheme has properly assessed cumulative impacts and the traffic forecasts across the appraised road network appropriately account for committed developments.

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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

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