

A57 Link Roads

TR010034

**9.39 Applicants comments on Written
Questions Responses**

Rule 8(1)(c)(ii)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

January 2022

Infrastructure Planning

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The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

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Table of contents

1.	Introduction	4
2.	REP2-049 – Campaign for National Parks Response to the Examining Authority's First Written Questions (WQ1)	5
3.	REP2-050 - CPRE Peak District and South Yorkshire Branch	6
4.	REP2-051 Derbyshire County Council Response to the Examining Authority's First Written Questions (WQ1)	9
5.	REP2-052 Environment Agency Response to the Examining Authority's First Written Questions (WQ1)	18
6.	REP2-053 High Peak Borough Council Response to the Examining Authority's First Written Questions (WQ1)	20
7.	REP2-053 Natural England Response to the Examining Authority's First Written Questions (WQ1)	40
8.	REP2-054 Peak District National Park Authority Response to the Examining Authority's First Written Questions (WQ1)	41
9.	REP2-055 Tameside Metropolitan Borough Council Response to the Examining Authority's First Written Questions (WQ1)	45

1. Introduction

- 1.1.1. This document sets out National Highways' comments on the Interested Parties' responses to the Examining Authority's First Written Questions submitted at Deadline 2 (14 January 2022).
- 1.1.2. The table is structured to include columns for the Examining Authority's Questions, the responses provided by the Interested Parties at Deadline 2, and National Highways' comments on these responses. Subheadings are provided within the table to separate the responses by Interested Party.
- 1.1.3. National Highways has sought to provide comments on responses where it is helpful to the Examination to do so, for example where clarification is required on a statement made by an Interested Party or where National Highways considers that it would be appropriate for the Examining Authority to have National Highways' views in response to a matter raised by an Interested Party.
- 1.1.4. Where issues raised within a question have been dealt with previously by National Highways, for instance in response to a question posed by the Examining Authority in its first round of written questions, National Highways response to written representation or within one of the application documents submitted to the Examination, a cross reference to that response or document is provided to aid the Examining Authority. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1.1.5. In order to assist the Examining Authority, National Highways has not provided comments on every point made within a response, since as stated in paragraph 1.1.3 it may have been addressed already. For the avoidance of doubt, where National Highways has chosen not to comment on matters raised by Interested Parties this is not an indication National Highways agrees with the point or comment raised or opinion expressed.

2. REP2-049 – Campaign for National Parks Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
2.2	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.	Please see National Highways’ response to Written Question 2.2 in its response to Examining Authority's First Written Questions (REP2-021) where we address updates to the NPPF.

3. REP2-050 - CPRE Peak District and South Yorkshire Branch

Question Number	Question	IP Response	National Highways Response
3.1 and 3.2	<p>The scheme objectives identified include reducing congestion and improving reliability of people's journeys through Mottram-in Longdendale, Hollingworth and Tintwistle, and also between Manchester and Sheffield city regions. What contribution to this aim does the Proposed Development make, outside of the DCO boundary?</p> <p>The Applicant has identified journey time savings within the limits of the scheme works.</p> <p>What effect, if any, would the Proposed Development have on journey times on the wider network outside the limits of the DCO works and, if these effects increase delays, to what degree would these delays offset the benefits identified by the Applicant?</p>	<p>There must be serious doubt about the effectiveness of the model to represent the impact of the scheme on the Greater Manchester and Sheffield city regions. This is summarised in Section 13.7 of <i>"Trans-Pennine Upgrade: Stage 3 Combined Modelling and Appraisal Report"</i> supplied by NH to CPRE and submitted to the DCO by them. In the CPRE consultant's report it says:</p> <ul style="list-style-type: none"> Both Sheffield and Manchester are excluded from the detailed modelling Because of the base model's overall size and strategic nature the networks within both cities are limited <p>For this reason the modelling cannot represent the impact of the scheme on traffic patterns in Greater Manchester.</p> <p>In relation to travel between the two cities, it is limited for two reasons:</p> <ul style="list-style-type: none"> the cities themselves are outside the ADM and modelled at a low level of detail access to the A628 is included in the ADM but strategic routes which are likely to be affected to the North and South are not. <p>In addition it is worth noting in relation to wider economic benefits that the current scheme is designed to slow the worsening of congestion, not reduce it compared to the present day. There appears to be no account of the increased attractiveness of rail, and to an extent bus, which will have similar or potentially improved journey times compared to today.</p>	<p>The traffic modelling undertaken to assess the impacts of the Scheme encompasses both Sheffield and Manchester, albeit at a lower level of detail compared to the road network most affected by the Scheme, i.e. the Area of Detailed Modelling (ADM). However, the analysis used to establish the monetised user benefits of the Scheme excludes travel within Sheffield and Manchester, since the Scheme is highly unlikely to have a sufficient impact on trips within these two cities to materially alter any user benefits or dis-benefits.</p>
3.3	<p>The Proposed Development is intended to provide benefits to the Strategic Route Network. The link road works are limited in extent and the length of new trunk road restricted to the dual carriageway section of the Proposed Development.</p> <p>a) What contribution, if any, would the Proposed Development make to achieving the wider benefits identified in the Road Investment Strategy (RIS) for the strategic road network between Manchester, Sheffield and the M1?</p>	<p>The scheme is being presented as standing alone. However it is quite clear that, if this were part of a larger scale cross Pennine proposal, the whole assessment would be different. The issue of breaking up large scale schemes and assessing them separately was discussed by the Government's Standing Road Advisory Committee on Trunk Road Appraisal in the 1980s and 90s. The conclusion was that schemes should be presented as a whole, particularly when clearly related to a corridor or wider area.</p>	<p>The assessment of the Scheme is fully compliant with the Department of Transport's Transport Analysis Guidance (TAG) and has appropriately accounted for other committed trans-Pennine transport infrastructure schemes.</p> <p>Derbyshire County Council has also confirmed that it is content with traffic modelling of the Scheme in its response 3.9 to the Examining Authority's first written questions (REP2-051).</p>

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	<p>b) Which other schemes, if any, identified in the RIS are needed to achieve the benefits identified for the scheme?</p> <p>c) What delivery method has been identified for these schemes and how will they be secured?</p>	<p>The second issue is that, if there were to be larger scheme it is far from clear how this would fit with it, given its Southern alignment.</p> <p>Finally there is the problem of the M67 “wet end” – the name transport planners often give a section of motorway which is connected to a network of much smaller scale.</p> <p>Conurbations generally try to moderate the impact by traffic control measures and using lanes for other purposes such as bus priority. In simple terms this scheme just pumps the traffic slightly faster in to and out of the wet end.</p>	
3.5	<p>The traffic data used within the modelling must be robust to properly assess the Proposed Development.</p> <p>Are the local authorities and local highway authorities content with the study area used in relation to transport networks and traffic?</p>	See the comments in 3.1/2	
3.6, 3.7, 3.9	<p>The traffic data used within the modelling must be robust in order to properly assess the Proposed Development.</p> <p>a) Are the local authorities and local highway authorities satisfied that the input data used in the modelling is appropriate to provide a basis for predicting future traffic flows, with particular regard to the assessment of committed development and future traffic growth?</p> <p>b) Are the local authorities and local highway authorities satisfied that the effects of other works on the network have been suitably addressed within the model?</p> <p>c) Please comment on the potential for additional trips to be attracted to the route in the “Do-Something” scenario compared with the “Do-Minimum” scenario and the implications for the assessment.</p> <p>d) Do the local authorities and local highway authorities have any more comments regarding the Applicant’s consideration of baseline conditions and surveys?</p> <p>NN NPS considers low demand, central traffic, and high demand forecasts, over which there is a large range of predicted changes in congestion.</p> <p>What range of forecasts have been considered by the Applicant and what is the justification for the chosen level?</p>	<p>We have no comment on the acquisition of traffic data for the present day. However we make the comment on 3.6a and 3.7 that the assumption of traffic growth in this area of Greater Manchester is not in line with TfGM’s 50-50 policy. This shows a fall in traffic by 2040 of approximately 17%. Most of this scheme is within Greater Manchester. GM traffic is an important part of the traffic using the road and should be factored in to the forecast. Nor is the DfT Decarbonisation Strategy target of 50% walking and cycling for trips within towns and cities represented in the forecast.</p>	<p>Please refer to National Highways’ response RR-0485-2 within the Applicant’s “Comments on Relevant Representations” (REP1-042).</p>

Question Number	Question	IP Response	National Highways Response
	Do the local authorities and local highway authorities have any more comments regarding the Applicant's overall assessment methodology, growth assumptions or modelling techniques?		
3.9	Do the local authorities and local highway authorities have any more comments regarding the Applicant's overall assessment methodology, growth assumptions or modelling techniques?	As well as the comments in 3.7 which also apply here, CPRE considers that the original options assessment was flawed but is now very much out of date. The carbon cost is also out of date and equally important the carbon reduction required by Government policy is undermined rather than supported. There is no assessment against Government health objectives.	Please refer to National Highways' response RR-0282-5 within the Applicant's "Comments on Relevant Representations" (REP1-042).
3.12	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 provided further comments on this alternative scheme. Do you have any further comments in regard to National Highways' comments?	Although a meeting has been held, NH have not yet undertaken a continuing technical dialogue with CPRE over the ban and sustainable transport measures, despite our requests. Some material has been supplied but very late and incomplete. NH do not seem to have commented on alternatives to any great extent and the report which is part of the CPRE submission covers this issue in much greater detail and responds to this question.	National Highways is holding regular meetings with CPRE's technical representative and is providing the additional requested information in as timely a fashion as possible. In many cases, the data being requested takes several days to extract, collate, check and issue.
3.13	Please confirm that the information provided regarding bus and train services are up to date. If the information has been superseded, please provide updated information.	As part of preparing alternatives it became clear that the bus information is seriously out of date leading to increases: the 237 runs every 20 minutes, and decreases: the X57 ceased operation in January 2022. The most frequent bus routes are in the South West corner of the study area, elsewhere there are obvious deficiencies.	Please refer to National Highways' response 3.13 in the "Applicant's response to Examining Authority's First Written Questions" (REP2-021).
3.14	Please provide details of the effect of the Proposed Development on public transport journey times across, and within, the study area. If possible, this information should include a Figure summarising changes in journey times.	One area of interest for CPRE has been the impact on public transport and how the forecasts for public transport use seem to be pessimistic. CPRE has sought clarification on this (including at the meeting on 15th December) but await further material.	The assessment of the Scheme has been undertaken in full accordance with the Department for Transport's (DfT) Transport analysis guidance and takes appropriate account of current and future committed public transport services and schemes. The model assumes that the bus provision is effectively constant over time, while committed rail schemes, which affect the attractiveness of rail as a mode, are reflected in the choice modelling, to the extent they are included in the underlying Trans Pennine South modelled public transport costs. Also please see response to 3.12 above.

4. REP2-051 Derbyshire County Council Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
1.36	<p>a) Please could the Applicant advise whether “otherwise” should be deleted from the first sentence of requirement 5(1)?</p> <p>b) Should it be required for the landscaping scheme to be approved before any part of the authorised development commences?</p> <p>c) With reference to Requirement 5(3), should the landscaping scheme be required to include details of hard surfacing materials?</p>	<p>Ideally the landscape scheme would and should be approved prior to the commencement of the works to ensure that the works make provision for the approved landscaping. Too many times landscape proposals have to be amended because the site hasn't been left in an appropriate condition for landscaping. Agreeing soft landscape details is more important than hard landscaping but ideally both should be agreed.</p>	<p>The drafting has not 'regulated' the submission of approved details prior to the commencement of development on the basis that landscaping is not considered by National Highways to be a fundamental point that needs to be confirmed prior to any works being carried out. By its very nature, landscaping will take place later in the construction programme and there is therefore flexibility as to precisely when the scheme should be submitted for approval. This is considered reasonable and reflects the same approach taken in other DCOs.</p>
1.41	<p>Should there be a requirement for the relevant planning authority, local highway authority and/ or the Environment Agency to be consulted on written details of the surface and foul water drainage system?</p>	<p>Yes. In Derbyshire County Council's experience of dealing with the discharge of Requirements for another DCO highways scheme, this has been beneficial to the County Council in its role as Highway Authority and Lead Local Flood Authority.</p>	<p>National Highways is content with this suggestion.</p>
2.1	<p>ES paragraph 1.3.10 sets out the Applicant's list of relevant adopted plans.</p> <p>a) Does this constitute the full list of development plans and policies relevant to the Proposed Development? Please explain their relevance.</p> <p>b) Are there are emerging development plans? If so, please supply copies there any emerging development plans? If so, at what stage are these proposed plans?,</p> <p>c) If there are emerging development plans, are there any policies in them which may be relevant? If so, please supply copies.</p> <p>d) Are there any non-statutory local policies which may be relevant? If so, please supply copies.</p>	<p>a) It is considered that in terms of Local Plans, reference should be made to the Derbyshire Local Transport Plan (LTP) 3 published in 2011 and the Saved Policies of the Adopted Derby and Derbyshire Minerals Local Plan (Adopted 2000 and Amended 2002) and the Saved Policies of the Derby and Derbyshire Waste Local Plan (Adopted 2005). Details of these policies are set out in Derbyshire County Council's and High Peak Borough Council's Joint Local Impact Report. The Minerals Local Plan sets out policies for the supply of aggregates, particularly for the development industry and the need to safeguard important mineral resources in the County from non- mineral development. The Waste Local Plan sets out policies for the disposal, treatment and management of waste, particularly through landfill. Minerals and waste planning policy - Derbyshire County Council</p> <p>b) Derbyshire County Council is currently reviewing the LTP3 although the review is in its relatively early stages and there have yet to be any published consultations on the Plan. Derbyshire County Council and Derby City Council are currently reviewing both the Minerals and Waste Local Plans. An Issues and Options Consultation on the Minerals Local Plan was published for consultation in 2018 and it is anticipated that a Draft Minerals Local Plan will be published for consultation in February 2022. No consultation has been carried out on the Waste Local Plan to date but it is anticipated that consultation on an Issues and Options Waste Local Plan will be published in the Spring of 2022.</p>	<p>All the plans identified here have been considered by the applicant within the submitted Case for the Scheme (REP2-016), in particular within Appendix A.</p> <p>With regard to the Derby and Derbyshire Waste Local Plan (adopted 2005), Chapter 10 of the submitted ES (APP-066) sets out the Applicant's approach regarding materials and waste.</p> <p>Given the early stage of this emerging plan, it is not considered to be relevant.</p>

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		<p>As such, at the current time, there are no published policies in either the Reviews of the Minerals or Waste Local Plans. New Minerals Local Plan - Derbyshire County Council Minerals local plan 2018 proposed approach - Derbyshire County Council Waste Plan - Derbyshire County Council</p> <p>c) See answer to b) above.</p> <p>d) Not as far as Derbyshire County Council is concerned.</p>	
3.8	<p>a) Have impacts on local transport networks and policies set out in local plans, including local policies on demand management been addressed sufficiently?</p> <p>b) Has enough account has been taken of local models?</p> <p>c) Have reasonable opportunities been taken to support other transport modes? d) Is the detail in the local transport model for the assessment of impacts proportionate to the scale and consideration of the impact of uncertainty on project impacts?</p> <p>e) Has there been a proportionate assessment of the transport impacts on other networks</p>	<p>a) There are a number of points on the local highway network that the County Council is unclear as to what the exact impacts of the scheme are likely to be. These are the subject of ongoing discussions between the County Council and NH.</p> <p>b). Derbyshire County Council do not have any traffic models covering Glossop.</p> <p>c). The Glossop A57 Link Roads project is identified in Derbyshire's LTP3. It refers to the Longdendale Integrated Transport Strategy LITS has a number of relevant transport objectives to address the key problems and issues within the Longdendale villages including a reduction in journey times on the local bus network and improve the services provided by buses. This would allow for, possibly increased frequency of bus services on selected routes, running throughout the day, seven days a week, between Glossop, Hyde, Ashton-under-Lyne and beyond together with increased opportunities for pedestrians to cross roads safely and feel less intimidated by traffic when using footways and better opportunities to encourage cyclists to use the local highway network.</p> <p>d). The County Council believe so.</p> <p>e). Yes</p>	<p>National Highways is continuing to engage with Derbyshire County Council to provide clarification on the impacts of the Scheme.</p>
3.9	<p>Do the local authorities and local highway authorities have any more comments regarding the Applicant's overall assessment methodology, growth assumptions or modelling techniques?</p>	<p>Derbyshire County Council believe the Applicants traffic modelling and economics assessments, along with the environmental assessments were carried out by a suitably competent consulting engineer in line with TAG guidance, these are then subject for scrutiny from Safety Engineering Standards</p>	<p>This is the subject of further discussions with the local authorities. The outcome of these discussions will be reported in further iterations of the relevant Statements of Common Ground.</p>

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		<p>(SES) and Transport Planning Group (TPG), who are independent of the project team and ensure that the process is followed throughout, and that the reports are fit for purpose.</p> <p>We understand also that the assessment work has been through a scrutiny process undertaken by an independent technical assurance team, in this case all of the work has been independently assured by WSP and final sign off by SES and TPG as being compliant with the guidance.</p>	
3.15	<p>The intention is stated to restrict use of the main carriageway of the scheme by walkers, cyclists, and horse riders.</p> <p>a) Would the Applicant please confirm the stretches of carriageway over which cycling will be prohibited and provide justification for the proposed restrictions.</p> <p>b) Would the Applicant explain how these restrictions will be delivered?</p> <p>c) If cycling provision is to be made outside the main carriageway, would the Applicant please explain what assessment has been made of likely levels of usage and potential for modal conflict.</p> <p>d) Please explain what design parameters, including, but not restricted to, width of route and design speed, have been used for off-carriageway routes and reasons for selecting those parameters.</p> <p>e) Do the local authorities and local highway authorities have any comments on the adequacy of this level of provision to cater for cycling demand on the local network and the support it provides for alternative modes of transport to the private car?</p>	<p>e) Derbyshire County Council's key concerns relate to the connectivity of the highway scheme with the surrounding Public Rights of Way network, particularly the Trans-Pennine Trail that runs close to the eastern boundary of the scheme adjacent to the River Etherow and existing A57 Wooley Bridge. Derbyshire County Council welcomes and supports the proposed design of the link road, which includes provision of a new footpath/cycle path running alongside the south-side of the new highway link road to Mottram Moor.</p> <p>Clarification is required, however, whether the footpath / cyclepath would also be used for horse riders.</p> <p>Derbyshire County Council also welcomes the connection of the new footpath / cyclepath with the Trans-Pennine Trail where it emerges alongside the River Etherow adjacent to the existing A57. This was an issue raised with National Highways on its PEIR consultation in 2020 and has now been addressed by the applicant in its DCO submission.</p>	<p>National Highways can confirm that the footpath/cyclepath running along the south side of the proposed single carriageway is also intended for use by horse riders.</p>
3.19	<p>Traffic flows crossing the Peak District on the A628 Woodhead Road and A57 Snake Road are anticipated to increase if the development proposal is implemented. Several Public Rights of Way cross these motor traffic routes.</p> <p>a) Has any statistical or other analysis of the comparison between the "Do-Minimum" and "Do Something" options of the distribution of acceptable gaps for pedestrians to cross the road been made?</p> <p>b) Do the local authorities and local highway authorities have any comments?</p>	<p>(b) The safety of the A57 Snake Pass is a major concern to the County Council as it is traditionally a route where various safety measures have been undertaken over the years. Any increases in flows along this route will compromise road safety further. As the County Council has exhausted its road safety engineering options for the route the only solution to ensure safety along the route is considered to be a system of average speed cameras in order to ensure vehicle speeds and road safety is maintained to the required level. DCC considers that National Highways should fund the scheme.</p>	<p>Please refer to National Highways' response RR-0240-6 to the Relevant Representations (REP1-042).</p> <p>The forecast increase in road accidents is based on the simplistic assumption that the forecast increase in traffic using the A57 Snake Road/Pass and the A628 due to the Scheme will result in a proportional increase in accidents. This does not necessarily mean that the Scheme will actually result in an increase in accidents on these sections of the road network. It should be noted that the Scheme improves road safety elsewhere on the affected road network and that the overall forecast increase in accidents equates to less than a 0.3% increase across the appraised road network, which represents only a marginal overall increase.</p>

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			<p>The forecast increase in accidents is a potential negative impact of the Scheme, but this is outweighed by the journey time savings and associated economic benefits that will be delivered by the Scheme.</p> <p>Nonetheless and as previously stated, National Highways will collaborate with Derbyshire County Council to identify potential measures to improve road safety on the A57 Snake Road/Pass. This will include providing National Highways' expert advice if requested and appropriate. National Highways recognises that any road safety improvement measures will need to be delivered by Derbyshire County Council as local highways authority and will need to be agreed in conjunction with the Peak District National Park Authority.</p> <p>National Highways has a Designated Funds allocation, which is separate to our core work of operating, maintaining and improving England's strategic road network. It provides ring-fenced funding that National Highways use to invest in and support initiatives that deliver lasting benefits for road users, the environment and communities across England. We welcome applications for funding from external organisations. All applications will need to demonstrate compliance with the required assessment criteria. If a suitable scheme to address the current issues being encountered along the A57 Snake Road/Pass can be identified, then National Highways will look to support DCC throughout the Designated Funds allocation process.</p>
3.21	<p>The Applicant proposes that safety measures and improvements, including a reduced speed limit, new cycling facilities and improved pedestrian crossings will be introduced on Wooley Lane to improve connectivity. The route would remain open to through traffic.</p> <p>a) Please clarify any identified aims, if any, of such works?</p> <p>b) What discussion has there been regarding the feasibility of delivery of works, including any Traffic Regulation Orders (TROs) to achieve the above aims?</p> <p>c) How would the proposed speed limit be enforced?</p> <p>d) Would enforcement be effective?</p> <p>e) Would there be remain any perceived benefit to using this route for motorised vehicle journeys between the Mottram Back Moor Junction and the junction of Wooley Lane with Wooley Bridge and Hadfield Road, rather than the route provided by the proposed link road.</p>	<p>(a) Any measures along Wooley Lane need to ensure that traffic heading towards Manchester does not turn left from the A628 onto it before it gets new link road. Wooley Lane is not suitable for increases in traffic flow and the road safety at the existing mini roundabout in Derbyshire would be compromised. The congestion leading into Glossop on this approach is already a concern. The introduction of cycle facilities, a reduced speed limit, pedestrian crossings will do nothing to deter traffic from using it. A prohibition of the use of Wooley Lane from the A628 would be more desirable in order to transfer the traffic entering Glossop to use the new link road.</p> <p>(b) There have been no discussions with DCC regarding the delivery of works here.</p> <p>(c) No plans have been seen by DCC on any proposals to date</p> <p>(d) No plans have been seen by DCC on any proposals to date.</p> <p>(e) Perhaps one way towards the A628 would benefit local drivers together with associated traffic calming measures, but would prevent it being used in preference to the new link road for those travelling towards Glossop from the A628</p>	<p>The introduction of the new single carriageway link between Mottram Moor and Woolley Bridge is expected to cater for a significant proportion of the movements which would otherwise enter Woolley Lane from the west. Any further controls applied to Woolley Lane, for example banning the left turn at the Gun Inn junction, would restrict access to the existing industrial areas off Graphite Way and Shaw Lane and potentially lead to vehicles turning off the existing A628 at its junction with New Road at Tintwistle and travel towards the villages of Hadfield and Padfield and then into Glossop as opposed to using the trunk road network. In addition, a prohibition would be detrimental to the overall journey time benefits generated by the scheme as a result of the increased distanced travelled by vehicles accessing Glossop from the A628 via the new link road rather than Woolley Lane.</p> <p>b) The proposals on Woolley Lane lie within the TMBC authority area</p>

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3.22	<p>One of the stated aims of the scheme relates to reconnecting communities along the Trans-Pennine Route. The Case for the scheme refers to increased pedestrian and cycle provision at the Gunn Inn Junction (Market Street/Woolley Lane/Mottram Moor) and traffic management measures on Market Street and Mottram Moor to increase pedestrian safety and connectivity.</p> <p>a) Are any details of these proposals available? b) Have these been subject to safety audit, if so, at what stage? c) Do the local authorities and local highway authorities have any comments on the deliverability and effect of such proposals?</p>	<p>(a) The A628 through Hollingworth and Tintwistle is the responsibility of National Highways rather than Derbyshire County Council. The residents of Tintwistle in Derbyshire would however welcome mitigation in terms of a form of traffic calming through the village along the A628. There are however also major concerns that vehicles could potentially turn off the existing A628 at its junction with New Road at Tintwistle and travel towards the villages of Hadfield and Padfield and then into Glossop as opposed to using the trunk road network. These Derbyshire roads need protecting from such usage which would be detrimental to their existing road safety records. Derbyshire County Council would welcome discussions over how this is mitigated against. The suggested scheme on Woolley Lane also should prohibit vehicles travelling south east towards Glossop as opposed to using the new link road to travel towards Glossop. Derbyshire County Council do not feel the measures suggested in this document will reduce vehicle flows but hopefully merely manage their speed.</p> <p>(b) Not a Derbyshire County Council scheme.</p> <p>(c) As (a) and Derbyshire County Council also have concerns about the A624 as migration measures on the A57 Snake Pass will also lead to vehicles transferring onto the A624 which also has a poor collision history. This needs to be considered too.</p>	<p>a) National Highways is not proposing any traffic calming on the A628 through Hollingworth and Tintwistle and this has not been included in the traffic modelling for the Scheme. The roads between the A628 and the villages of Hadfield and Padfield are part of Derbyshire County Council's road network and consequently, it is for Derbyshire County Council to implement any measure to discourage inappropriate use of these roads by through traffic.</p> <p>The journey time benefits provided by the Scheme combined with the proposed traffic calming measures on the de-trunked section of the A57 will make the new link road a much more attractive route than alternative routes for most traffic, especially longer distance through traffic. This has been demonstrated by the traffic modelling. Therefore, National Highways do not consider it necessary or appropriate for the Scheme at Woolley Lane to include a prohibition on vehicles travelling south east towards Glossop to provide further encouragement for traffic to use the new link road rather than alternative routes.</p> <p>c) National Highways is not proposing any traffic calming on the A57 Snake Road/Pass and this has not been included in the traffic modelling for the Scheme. The traffic modelling indicates that the scheme will result in marginally reduced traffic flows on the A624.</p>
3.36	<p>Do the local authorities have any more comments regarding the Applicant's assessment of construction traffic and temporary closures and diversions, including:</p> <p>a) the nature of likely effects on receptors; b) relevant mitigation measures secured by the dDCO, Outline Traffic Management Plan, and Outline EMP; c) whether any potential to worsen accessibility would be mitigated so far as reasonably possible; d) the sufficiency of consideration given to mitigation by way of the design, lay-out or construction methods for the Proposed Development e) whether the mitigation measures are proportionate, reasonable and focussed on promoting sustainable development; f) whether the mitigation measures are enforceable, precise, sufficiently secured and likely to result in the identified residual impacts; g) the identification of all significant impacts; and h) road safety during construction?</p>	<p>As 3.35 for all (a) to (h).</p> <p>Derbyshire County Council would generally welcome advice from the National Highways Design team at an early stage on what mitigations can be provided due to the lack to diversionary routes on the Derbyshire Network.</p> <p>There are safety concerns due to the lack of options on the Derbyshire Network.</p>	<p>National Highways is continuing to engage with Derbyshire County Council regarding the potential impacts of the Scheme on their road network.</p>

Question Number	Question	IP Response	National Highways Response
3.37	<p>a) Where a bus stop is to be removed, relocated or replaced would the applicant please provide a Figure showing: • the location of the bus stop to be removed, relocated, or replaced; • where a bus stop will be relocated or replaced, the proposed location of the bus stop and the distance between that and the position of the existing stop; and • where a bus stop is to be removed, the location of the nearest alternative bus stop and the distance between that and the position of the stop to be removed.</p> <p>b) What local requirements for public consultation or approvals (if any) exist to remove, relocate or replace a bus stop?</p> <p>c) Do the local authorities or local highway authorities have any comments on proposed changes to bus stop locations?</p>	<p>General Comment- It is very difficult to say with any certainty what would happen with bus services when the new road opens and the impact this would have on demand for new bus stops. The bus operators may choose to stay on the old road and continue their current routes as this is where the existing demand is likely to be or they may change to the new road in the hope this generates new fresh demand. At the moment because of the state of the bus market it is hard to say which services will be in place in 6 months time so second guessing the state of the market in the years it will take to complete this new road would be virtually impossible. There is the further complication of bus franchising which Transport for Greater Manchester will be introducing in the next 5-10 years which will mean certain routes such as the existing 237 are likely to be specified by TFGM who will have the final say on the route.</p> <p>a) There are two (Derbyshire County Council) bus stops which fall within the DCO boundary. Both are on Woolley Bridge, one with a shelter, north-west bound just before the Woolley Bridge Road junction and the other southbound in the vicinity of the new A57 Link Road junction with Woolley Bridge. As indicated on 'Sheet 6' there is a development access immediately within this junction and in conjunction with this the bus stop has recently been relocated to a new position approximately 18m south (but is still within the DCO). This latter stop is likely to require further relocation in conjunction with the construction of the A57 Link Road junction. Neither of the two bus stops are indicated on the scheme layout plans – Sheet 6 being the relevant one here. It should be noted that (from 10/01/2022) neither of these stops are in use as part of the local bus network. It is not thought likely that any of the services currently forming the local bus network would use the Link Road but any new service broadly linking Glossop with Manchester may well do so. If, at some future point, local bus services were to use the new Link Road it is likely that new bus stop positions would be beneficial on the Link Road itself and as such passive provision should be considered for these. Depending on the actual position these may fall within the jurisdiction of Transport for Greater Manchester.</p> <p>(b) There are no local requirements for public consultation or approvals to remove, relocate or replace a bus stop. This only varies where a bus shelter is involved and, on such occasion, there is a requirement to notify (not consult) intentions to any properties in the immediate vicinity. That said, Derbyshire County Council would expect that any requirement to relocate a bus stop facility because of the Link Road provision be clearly</p>	

Question Number	Question	IP Response	National Highways Response
		shown as such on any public facing plans at the earliest opportunity. Anynew bus stop position would be required to meet requirements of theDerbyshire County Council Highway Traffic & Safety team and be constructed such that it meets the relevant accessibility standards. Inthis instance National Highways would be expected to cover all costs associated with any change to a bus stop location within the DCO which is required because of the Link Road provision.	
6.4	<p>When referring to designated heritage assets, the NPPF only identifies two levels of harm, substantial and less than substantial. Table 6.3, which sets out the factors in assessing the magnitude of impact, also identifies limited harm.</p> <p>a) Applicant - Please set out whether limited harm should be qualified as less than substantial in terms of the NPPF tests? If not, please explain how limited harm should be considered against paragraph 199 of the NPPF which states that great weight should be given to an asset's conservation irrespective of whether any potential harm amounts to substantial, total loss or less than substantial harm to its significance.</p> <p>b) Historic England, Derbyshire County Council, High Peak Borough Council and Tameside Metropolitan Borough Council – Do you have any comments on the use of limited harm given the tests sets out in the NPPF?</p>	<p>A) It is the opinion of Derbyshire County Council that limited harm is still harm and as such it should be considered as falling under less than substantial harm (LTSH) under the current NPPF.</p> <p>B) It is the opinion of Derbyshire County Council that there are varying degrees of harm within either categories; substantial harm (SH) or LTSH although granted this may not be alluded to in the current NPPF. With this in mind it is the County Council's opinion that the term 'limited harm' could be interpreted as being at the lower end of the scale of LTSH.</p>	<p>a) As identified in the recent judgement in the case of R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited, it is recognised that a broad spectrum of harm may be covered within the categories of substantial and less than substantial harm.</p> <p>Limited harm, as identified in Table 6-3 (REP1-015), is therefore understood to constitute less than substantial harm.</p> <p>The assessment of limited harm will be a consideration when assessing the weight to be given to conservation of a heritage asset under paragraph 5.132 of the NPSNN and paragraph 199 of the NPPF. In this exercise, limited harm would be considered to fall at the lower end of the spectrum of less than substantial harm.</p>
8.11	<p>Item C1.8 of the REAC [REP1-037] states that: "A comprehensive Carbon Management Plan would be implemented from the Detailed Design stage and through construction. This would follow a data collection and analysis methodology which adheres to the requirements of the PAS 2080. This would assess carbon use for the whole lifecycle of the project and promote embodied carbon management and commit to achieving carbon reductions." The ExA wishes to ensure that the mitigation measures are enforceable and precise and will result in mitigation being delivered.</p> <p>a) Please could more detail be provided on the Carbon Management Plan and how it would be enforced?</p> <p>b) How can the precision be improved to clarify that carbon emissions would be reduced?</p> <p>c) To be precise, should the reduction be quantified?</p>	<p>General comments/expectations relating to a Carbon Management Plan from Derbyshire County Council's perspective:</p> <ul style="list-style-type: none"> • It should clearly set out ownership of targets and actions. • As well as emissions from construction and operation, the Plan should consider indirect emissions, such as from business overheads which can be attributable to the Scheme and business miles associated with the Scheme's construction and operation (including employee commuting miles). • The Plan should set out how the Contractor's approach to delivery will support the relevant net zero targets. • The Plan should establish a baseline carbon footprint against which future targets will be based. • The Plan should detail the framework and methodology for calculating the baseline and future assessments, providing references and justifications for the methodologies adopted. 	<p>The Carbon Management Plan (CMP) for the Scheme will set out targets, as well as actions and responsibilities for delivering them. The CMP will also be aligned with the National Highways Net Zero Plan.</p> <p>Business emissions, such as from business overheads and corporate travel, are managed by the corporate organisations delivering the Scheme. It would be duplicitous to include these in the project carbon management, and they are excluded on this basis. This is the standard practice across all schemes.</p> <p>The plan includes commentary explaining how it aligns with the National Highways Net Zero Plan.</p> <p>A carbon model will be produced using the Preliminary Design, as submitted for the DCO application. This is the precursor to the Detailed Design phase, which will be used as the carbon baseline/ benchmark.</p> <p>The CMP will include procedures for carbon modelling of options assessment and whole scheme modelling and reporting, including references and assumptions. The methodology follows all of the main technical standards including PAS 2080 Carbon Management in Infrastructure, RICS and iStructE</p>

Question Number	Question	IP Response	National Highways Response
		The Plan should identify carbon reduction targets for the first contract year, detailing how these targets are to be met (as a minimum for all listed activities).	Carbon reduction targets are specified for the whole Scheme, to be delivered through action taken throughout scheme development. There is no practical value in setting time-specific reduction targets, as reductions are achieved based on engineering development and construction planning activities, not a predefined timetable. The technical standards do also not specific time-based targets.
8.14	Paragraph 14.13.1 of ES Chapter 14 [REP1-019] states that "...mitigation measures have been embedded into the Scheme design (Section 14.9) to reduce emissions as far as possible." Have appropriate carbon-reduction measures been secured for the operational phase, including but not limited to: • reducing traffic; • increasing the use of other transport modes; • behavioural change; • the use of energy, including for lighting; • the use of trees or other plants in the soft landscaping to absorb carbon dioxide; • carbon offsetting; • any other measures.	<p>a) See Derbyshire County Council's comments in respect of questions in Section 3 above.</p> <p>b) There appears to be a lack of reference to, and acknowledgement of, the government's strategic priorities of increasing modal shift to active travel. Segregated cycling routes are proposed as part of the Scheme, but it doesn't seem to contribute enough to creating a network of cycleways and footways that would encourage active travel and reduce the reliance on vehicle use.</p> <p>c) Nothing to note</p> <p>d) The assessment does not seem to take account of any potential opportunities for renewable energy installations and generation within the Scheme's boundary, which seems like a missed opportunity to explore options.</p> <p>e) The assessment does not seem to make reference to measures around habitat creation and protection, which would have benefits from a carbon offsetting/sequestration, and also climate change adaptation point of view.</p> <p>f) Same as above (for e)</p> <p>g) Nothing to note</p>	<p>a) National Highways have responded to DCC's comments in Section 3 separately, please see above</p> <p>b) Please refer to National Highways' response to question 8.14 in the Examining Authority's First Written Questions (REP2-021)</p> <p>c) No response required</p> <p>d) It is National Highways position that the private sector will provide EV charging across the network. It is therefore not within the scope of individual projects to deliver infrastructure. National Highways are supporting the UK's rapid transition to EVs through implementing their 'Net Zero Highways Plan'.</p> <p>e) Please refer to National Highways' response to question 8.14 in the Examining Authority's First Written Questions (REP2-021)</p> <p>f) Same as e)</p> <p>g) No response required</p>
8.16	Do the local authorities or the Environment Agency have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy with respect to climate change?	<ul style="list-style-type: none"> It is disappointing that emissions from short- and long-term land use change have not been included in the assessment, with the justification being that 'a proportionate approach shall be applied to calculating and reporting GHG emissions from changes in land use and forestry (i.e. reporting only where there is likely to be a substantial change)'. The carbon (and wider sustainability) impact of land use change can be significant over the life-time of a Scheme, such as through soil disturbance, and loss of vegetation and biomass. Vehicle emission factors take account of Department for Transport fleet projections including conventional vehicles (petrol and diesel) as well as hybrid and electric vehicles, but do not take account of government commitments to changes in fleet makeup, for example the phasing out of conventional fuel cars and vans by 2030. 	<p>Please refer to National Highways' response to question 8.14 in the Examining Authority's First Written Questions with respect to sequestration and carbon offsetting.</p> <p>Please refer to National Highways response to question 8.13 in the Examining Authority's First Written Questions with respect to future year changes beyond 2030.</p> <p>Please refer to National Highways response to question 7.2 in the Examining Authority's First Written Questions with respect to the potential for climate change to influence air quality.</p>

Question Number	Question	IP Response	National Highways Response
		It is disappointing that the air quality assessment does not include an analysis of the impact of climate change on air quality. Vehicle emissions will be intensified as hotter summers will increase the formation of ground-level ozone, which is a dangerous air pollutant. The statement given that these types of impacts will likely be offset by the predicted future fleet wide shift toward electric and hybrid vehicles does not have any sound evidence to back it up.	

5. REP2-052 Environment Agency Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
1.39	<p>Should this requirement include:</p> <ul style="list-style-type: none"> a) for no part of the authorised development to commence until a contamination risk assessment has been produced for that part; b) details of what is to be included in a contamination risk assessment and in a written scheme and programme; c) for contamination risk assessments to be submitted to and approved by the Secretary of State in consultation with the Environment Agency; and d) for construction to cease in the vicinity of any contaminated material that is found until a risk assessment and written scheme and programme have been submitted and approved? <p>Does the Environment Agency have any other comments?</p>	<p>We would support the inclusion of the inspectors recommendations within the requirements but would also recommend the following requirements are included in the DCO which is a standard form of wording which we utilise to address this matter:</p> <p>(1) In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development which was not previously identified in the environmental statement, it must be reported as soon as reasonably practicable to the Secretary of State, the relevant planning authority and the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the relevant planning authority and the Environment Agency.</p> <p>(2) Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority on matters related to its function and the Environment Agency</p> <p>(3) Remediation must be carried out in accordance with the approved scheme.</p> <p>We would also highlight that following the review of the water quality data, we identified that the groundwater contained elevated concentrations of specific substances with an EQS including cadmium, chromium, cyanide, manganese, and total PAH, and that the applicant was unable to demonstrate compliance with the EQS. As the proposed discharge would provide most of the flow in the stream, i.e., 601/min discharge rate compared to 51/min flow in the stream, there would be minimal dilution of the discharge, resulting in the stream being unsuitable for the proposed discharge. Therefore, we would recommend that alternative arrangements are sought for the disposal of the pumping test waters.</p>	<p>The water quality data presented so far was from the 2018 Ground Investigation Report as the 2021 ground investigation was ongoing at the point of submission. The results from the 2021 groundwater monitoring are presented in the 2021 Ground Investigation Report which will be submitted into the examination at a later deadline. The results from groundwater monitoring undertaken during the 2021 ground investigation are summarised within the Hydrogeological Risk Assessment for areas of the Scheme where dewatering is likely to be required to give an indication of likely discharged water quality. The Hydrogeological Risk Assessment is submitted into the examination at deadline 3.</p>
1.57	<p>Please could each Statutory Undertaker and the Environment Agency:</p> <ul style="list-style-type: none"> a) confirm whether it agrees with the provisions of the relevant Part of Schedule 9; b) identify all relevant side agreements; 	<p>EA Response</p> <p>The Environment Agency would like to recommend a shorter form of Protective Provisions</p>	<p>National Highways can confirm that the short form of protective provisions with the Environment Agency has been included in the draft Development Consent Order submitted at Deadline 3 (TR010034/APP/3.1(2)).</p>

Question Number	Question	IP Response	National Highways Response
	identify any matters that are still subject to agreement.		
10.5	<p>Please comment on:</p> <p>a) The ability of the local waste infrastructure to satisfactorily deal with waste from the Proposed Development?</p> <p>Whether any adverse effect is anticipated on the capacity of existing waste management facilities to deal with other waste arisings in the area?</p>	<p>EA Response</p> <p>We can confirm that we consider that there will be minimal impact of our local waste infrastructure and no adverse effect is anticipated on the capacity of the existing waste management facilities</p>	
11.5	<p>The Applicant refers to additional ground investigation.</p> <p>a) Is the Hydrogeological Risk assessment mentioned available?</p> <p>b) If so, what additional effects of the Proposed Development, if any, does it indicate?</p> <p>If not, when will this information be available?</p>	<p>EA Response</p> <p>The EA requires the HRA to understand the impact of the proposed development on groundwater and its users.</p>	<p>The Hydrogeological Risk Assessment will be submitted as part of the Deadline 3 Submission. A copy has also been made available to the EA.</p>
11.8	<p>Climate change allowances were anticipated to change in 2021.</p> <p>Are you satisfied that any such changes have been incorporated within on peak river flow and that the compensatory flood storage volume is adequate over the lifetime of the proposed highway structure?</p>	<p>The FRA needs to be updated to reflect the latest climate change allowances which were published in July 2021. The applicant will also need to update the FRA to reflect the latest fluvial allowances for the Upper Mersey catchment in order to ensure the provision of appropriate compensatory storage.</p>	<p>As agreed with EA and set out in an email dated 14 January 2021 and the Statement of Common Ground (SoCG), we have adopted the climate change guidance as set out in the NPPF. Flood Risk and Coastal Change. Table 1 July 2020 (.gov.uk) to inform the design.</p> <p>As set out in previous technical correspondence associated with the modelling of the Etherow and the flood risk management provisions, we used the 35% Higher Central (epoc 2070-2115) for design with a sensitivity model run looking at the Upper end scenario of 70%.</p> <p>Since this was presented, climate change allowances have been updated to include the H++ (95%) allowance. As such, we have undertaken a further sensitivity run of 95% increase in flows to examine the vulnerability of this type of development (Essential infrastructure) to future flood risk.</p>

6. REP2-053 High Peak Borough Council Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
1.28	Should the undertaker be required to consult with the relevant planning authority prior to felling, lopping and/ or replacing any tree subject to a tree preservation order?	As a point of principle, consultation in such circumstances would be appropriate. However, the Borough Council is not aware of any protected trees in High Peak that are expected to be felled.	
1.32	Please identify where it would be helpful, for example to bring clarity or to help avoid any later misunderstandings, for specific provisions to be included in any Requirement for consultation or agreement to be required with relevant bodies. In each case, please explain why the provisions should be included.	Requirements 3, 4, 5, 6 and 10 already make satisfactory provision for consultation with the planning authority prior to the submission of documents to the Secretary of State.	
1.33	a) Should there be a requirement for consultation on the second iteration EMP with the local highway authorities and the Environment Agency, as well as with the relevant planning authority? b) To give certainty that the measures identified in the ES are secured, should the second iteration EMP be required to incorporate the measures for the construction stage referred to in the ES as being incorporated in the EMP? c) Should there be a requirement for the second iteration EMP to contain a record of the consents, commitments and permissions resulting from liaison with statutory bodies? d) Should there be a requirement for the second iteration EMP to be kept up to date with any material changes during construction and for consultation to be required on those changes?	Provision for an optional second consultation should be made to allow consultees to comment on revisions if deemed necessary ahead of submission to the Secretary of State.	
1.34	a) Please could the Applicant provide an explanation as to why each activity (i) to (ix) cannot be carried out during the specified working hours? b) Should the following be added after Requirement 4(2)(c): <i>“Provided that written notification of the extent, timing and duration of each activity is given to relevant local authorities in advance of any works that are to be undertaken outside of the specified hours, except for any emergency works, which are to be notified to the relevant local authorities as soon as is practicable.”</i> <i>“Any other work carried out outside the specified working hours or any extension to the working hours will only be permitted if there has been prior written agreement of the relevant environmental health officer and provided that the activity does not give rise to any materially new or materially worse environmental effects</i>	Prior notification would be welcome.	

Question Number	Question	IP Response	National Highways Response
	<i>in comparison with those reported in the environmental statement.”</i>		
1.35	<p>a) Should there be a requirement for the third iteration EMP to be submitted to and approved in writing by the Secretary of State?</p> <p>b) Should there be a requirement for consultation on the third iteration EMP with relevant planning authorities, the local highway authorities and the Environment Agency?</p> <p>c) To give certainty that the measures identified in the ES are secured, should the third iteration EMP be required to:</p> <ul style="list-style-type: none"> • be substantially in accordance with the measures for the management and operation stage first iteration EMP; and to • incorporate the measures for the management and operation stage referred to in the ES as being incorporated in the EMP? 	<p>a) No comment.</p> <p>b) If a third iteration is required, consultation with the LPAs would be welcome.</p> <p>c) A consistent approach would be preferable.</p>	
1.48	<p>Please could the local planning authorities and local highway authorities advise whether they:</p> <p>a) have reviewed the detailed contents of Parts 1-9 of Schedule 3 and provided their comments to the Applicant;</p> <p>b) are awaiting any responses from the Applicant and/or is aware of any matters that have not been agreed with it;</p> <p>c) have any concerns about Parts 1-9 of Schedule 3?</p>	High Peak Borough Council has not commented on Part 1-9 of Schedule 3 but would follow the advice of the highways authority in respect of such matters.	
1.50	<p>Please could the local planning authorities and local highway authorities Applicant advise whether they:</p> <p>a) have reviewed the detailed contents of Parts 1-3 of Schedule 4 and provided their comments to the Applicant;</p> <p>b) are awaiting any responses from the Applicant and/or is aware of any matters that have not been agreed with it;</p> <p>c) have any concerns about Parts 1-3 of Schedule 4?</p>	High Peak Borough Council has not commented on Part 1- 3 of schedule 4 but would follow the advice of the highways authority in respect of such matters.	
1.55	Are the local planning authorities aware of any hedgerows or trees subject to a tree preservation order that are missing or incorrectly referenced in Schedule 8 and / or on the TPO and Hedgerows Plans?	There are no tree preservation orders missing from the plans within the red line boundary in High Peak.	
2.1	<p>ES paragraph 1.3.10 sets out the Applicant's list of relevant adopted plans.</p> <p>a) Does this constitute the full list of development plans and policies relevant to the Proposed Development? Please explain their relevance.</p> <p>b) Are there any emerging development plans? If so, please supply copies of any emerging development</p>	<p>a) planning authority area of High Peak that is the responsibility of the Borough Council. This is referenced in the Environmental Statement. However, the ES only refers to Policies CF6 (Accessibility and Transport) and S5 (Glossopdale Sub-Area Strategy). It is considered that Local Plan policies EQ10 (Pollution Control and Unstable Ground), Policy EQ4 (Green Belt Development) and Policy EQ11</p>	All the policies identified were considered within the submitted Case for the Scheme (REP2-016), in particular within Appendix A.

Question Number	Question	IP Response	National Highways Response
	<p>plans? If so, at what stage are these proposed plans?</p> <p>c) If there are emerging development plans, are there any policies in them which may be relevant? If so, please supply copies.</p> <p>d) Are there any non-statutory local policies which may be relevant? If so, please supply copies.</p>	<p>(Flood Risk Management) are also of relevance to the scheme. Derbyshire County Council is responsible for minerals and waste plans.</p> <p>b) High Peak Borough Council is in the early stages of undertaking a review of the Local Plan. This is currently focussed on evidence gathering only and there is no draft plan to take into account.</p> <p>c) N/A</p> <p>d) The Borough Council is in the process of developing a masterplan for the "Glossop Gateway" which covers the main corridors into Glossop and Hadfield from Woolley Bridge. The masterplan seeks to:</p> <ul style="list-style-type: none"> Promote the delivery of planned growth in the area and enhance business rate growth; Unlock housing and employment growth, providing more certainty to developers of local residential schemes; Identify proposals to address residual effects of the A57 Link Roads which may affect local quality of life, the environment, health and wellbeing; Manage local environmental and connectivity improvements by ensuring that new development is framed by high quality green and active travel infrastructure; Support the delivery of other Glossop and Hadfield town centre benefits; and Guide balanced and sustainable development <p>Work on the masterplan is currently paused until the status and full implications of the A57 Link Roads scheme are clear.</p> <p>The masterplan follows on from the Glossop Design and Place Making Supplementary Planning Document (adopted 2012) which identifies issues facing Glossop Town Centre and related design solutions. The approach to the town centre via and A57 Dinting Vale is identified as suffering from high volumes of traffic and congestion. Improvements to be considered for these key routes include improved surfacing materials, street lighting and other street furniture including signage, planting and street trees where appropriate and consistent quality boundary treatments. The SPD can be found on the Council's website</p>	
2.2	<p>The NPPF has been updated since the application was submitted.</p> <p>a) How do the revisions of the NPPF affect the Proposed Development and the ES?</p> <p>b) To what degree do you consider those development plan policies which you consider most relevant to the Proposed Development accord with the aims of the NPPF?</p> <p>c) Please could the Applicant comment on the implication of the following changes to the NPPF for the</p>	<p>a) The 2021 NPPF places a stronger emphasis on good design and climate change. This includes a requirement for tree lined streets as well as consideration of the National Model Design Guide and Code. The applicant could be asked to set out how the application responds to the requirements of the new Framework (as per 2.2c).</p> <p>b) The High Peak Local Plan was prepared and examined under the provisions of the 2012 NPPF. National policy has evolved since then but the policies in question are considered to be</p>	<p>Please see National Highways response to Written question 2.2 in the response to Examining Authority's First Written Questions" (REP2-021) where we address updates to the NPPF.</p>

Question Number	Question	IP Response	National Highways Response
	<p>assessment of the Proposed Development:</p> <ul style="list-style-type: none"> Chapter 9 Promoting Sustainable Development – design of streets and transport elements should reflect current national guidance, including the National Design Guide and National Model Design Code. Chapter 12 Achieving Well-designed Places – increased focus on making beautiful and sustainable places. 	broadly consistent with the aims of the 2021 NPPF.	
2.3	<p>Paragraph 4.48 of the National Policy Statement for National Networks (NPSNN) refers to discharges or emissions which affect air quality, water quality, land quality or include noise and vibration. It notes that these may be subject to separate regulation under a pollution control framework or other consenting and licensing regime. Paragraph 4.55 refers to a need to ensure that the relevant pollution control authority is satisfied that potential releases can be adequately regulated and that the pollution effects would not be unacceptable.</p> <p>Are the relevant authorities satisfied that:</p> <p>a) the potential discharges and emissions from the Proposed Development would be adequately regulated under the appropriate regime; and that</p> <p>b) the effects of existing sources of pollution are not such that the cumulative effects of pollution when the Proposed Development is added would make the development unacceptable, particularly in relation to statutory environmental quality limits?</p>	<p>a) Environmental emission arising from construction (dust etc) can generally be controlled through additional environmental legislation (e.g. Control of Pollution Act, 1974; Environmental Protection Act, 1990 Environmental Permitting Regulations, 2016). Operational emissions (Noise / AQ emissions) from vehicles using the road after construction cannot really be regulated effectively through existing legislation, other than adjusting the parameters of the road e.g restricting use to certain vehicle types etc – such as seen in a Clean Air Zone, or changing speeds etc.</p> <p>b) There are two existing AQMA's in HPBC, have been declared due to exceedances in AQ objectives for Nitrogen Dioxide (NO₂). The primary contributor to NO₂ at both these locations is considered to be from the road sources therefore any significant increase in emission from road sources could make it harder to achieve compliance with AQ objectives. This would not necessarily mean that the development would be unacceptable, as mitigation could be implemented to offset this impact. Currently however, the actual impacts of the development on the AQMA (s) has not been evaluated, as it has been screened out based on the transport model predicting that the likely increase traffic on these roads being lower than the adopted screening criteria.</p>	<p>a) no response needed</p> <p>b) The air quality study area has been determined in accordance with DMRB LA 105, which is considered to be best practice guidance for assessing highways schemes. DMRB LA 105 defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1). The traffic change criteria were applied to output from the Scheme specific traffic model to determine the ARN. The Scheme specific traffic model includes strategic roads, including the A57 through the Glossop AQMA and the A628 through Tintwistle AQMA. Both the extent of the ARN and the AQMAs are presented in Figure 5.1 in Environmental Statement (APP-076).</p> <p>For the Glossop AQMA the traffic change criteria are not exceeded for the A57 south of the Dinting Vale junction. The A57 north of the Dinting Vale junction and the A626 Glossop Road, west of the Dinting Vale junction, do exceed the traffic change criteria and the Dinting Vale junction, which is within the Glossop AQMA has been included in the air quality assessment presented in ES Chapter 5 Air Quality (REP2-006). The traffic change due to the Scheme along the A628 meets the DMRB LA 105 traffic scoping criteria between the Junction with Woolley Lane and New Road and receptors have been included in the air quality modelling presented in Environmental Statement Chapter 5: Air Quality (REP2-006). This section of the A628 is not within the Tintwistle AQMA. Where traffic change criteria are not exceeded, such as on the majority of the roads within Glossop AQMA, this indicates that there would not be a significant adverse effect on air quality due to the Scheme at these locations.</p> <p>Evaluation of the significance of the effect of the Scheme on human health has been undertaken in accordance with DMRB LA 105 (paragraph 2.89 to 2.96). Only those receptors where AQS objectives are exceeded with or without the Scheme are included in the evaluation. Of the 76 receptors informing the overall significance of effect of the Scheme on air quality, 67 are located in AQMAs. One receptor located in the Glossop AQMA at Dinting Vale junction (receptor number R319) is expected to have a small worsening in air quality, while 66 receptors located in the Greater Manchester AQMA adjacent to the A57 in Mottram and are expected to have medium and large improvements. The receptors informing the significance of effect are presented in Figure 5.5 in Environmental Statement (REP1-021).</p>

Question Number	Question	IP Response	National Highways Response
			<p>It is acknowledged that there would be increases and decreases in air pollutant concentrations due to the new link roads and the resulting redistribution of traffic on existing roads. However, the assessment undertaken for the ES concluded that on balance the Scheme is expected to result in an overall improvement in local air quality for human health receptors, with decreases in concentrations such that there is a reduction in the extent of areas where government AQS objectives are exceeded. Where there are increases in concentrations these are either in areas where government AQS objectives are not exceeded or in the case of receptor number R319 in Glossop AQMA, in a location where government AQS objectives are exceeded both with and without the Scheme. The Scheme does not therefore affect the ability to meet AQS objectives within the Glossop AQMA in the Scheme opening year.</p> <p>It is understood that an air quality action plan, covering both the Tintwistle AQMA and Glossop AQMA has been prepared in draft by High Peak Borough Council which lists a number of proposed measures, however, the action plan is on hold pending review of the traffic data for this Scheme.</p>
3.3	<p>The Proposed Development is intended to provide benefits to the Strategic Route Network. The link road works are limited in extent and the length of new trunk road restricted to the dual carriageway section of the Proposed Development.</p> <p>a) What contribution, if any, would the Proposed Development make to achieving the wider benefits identified in the Road Investment Strategy (RIS) for the strategic road network between Manchester, Sheffield and the M1?</p> <p>b) Which other schemes, if any, identified in the RIS are needed to achieve the benefits identified for the scheme?</p> <p>c) What delivery method has been identified for these schemes and how will they be secured?</p>	<p>6.1.8.</p> <p>a) The scheme could contribute towards creating a more reliable network as per the vision of RIS.</p> <p>b) None known.</p> <p>c) N/A</p>	
3.8	<p>a) Have impacts on local transport networks and policies set out in local plans, including local policies on demand management been addressed sufficiently?</p> <p>b) Has enough account has been taken of local models?</p> <p>c) Have reasonable opportunities been taken to support other transport modes?</p> <p>d) Is the detail in the local transport model for the assessment of impacts proportionate to the scale and consideration of the impact of uncertainty on project impacts?</p>	<p>Whilst Local Plan Policy CF6 Accessibility and Transport is referenced in the Environmental Statement. It is not clear how its requirements in terms of demand management have been specifically considered.</p> <p>6.1.10.</p> <p>Please refer to comments from the local highway authority and our joint Local Impact Report prepared with Derbyshire County Council for commentary regarding the suitability of transport modelling.</p>	<p>Policy CF6 states: <i>The Council will seek to ensure that development can be safely accessed in a sustainable manner. Proposals should minimise the need to travel, particularly by unsustainable modes of transport and help deliver the priorities of the Derbyshire Local Transport Plan.</i></p> <p>The policy is primarily about proposals that come forward for the development of land (and the impacts of these) rather than highways projects such as the Scheme. It mainly sets out what actions the Council will take to achieve the aims of the policy, including under the subheading of supporting transport infrastructure and services, promoting the</p>

Question Number	Question	IP Response	National Highways Response
	e) Has there been a proportionate assessment of the transport impacts on other networks?		<p>maintenance and introduction of appropriate facilities to support cyclists, pedestrians and horse riders.</p> <p>As set out in the Case for the Scheme (REP2-016), the scheme aims to bring new transport infrastructure and services to enhance connectivity. It will provide facilities for pedestrians and cyclists.</p>
3.9	6.1.12. Do the local authorities and local highway authorities have any more comments regarding the Applicant's overall assessment methodology, growth assumptions or modelling techniques?	Please refer to comments from the local highway authority and our joint Local Impact Report prepared with Derbyshire County Council for commentary regarding the suitability of transport modelling.	Please refer to National Highways' response on the joint Derbyshire County Council and High Peak Borough Council Local Impact Report (TR010034/EXAM/9.37).
3.15	<p>The intention is stated to restrict use of the main carriageway of the scheme by walkers, cyclists, and horse riders.</p> <p>a) Would the Applicant please confirm the stretches of carriageway over which cycling will be prohibited and provide justification for the proposed restrictions.</p> <p>b) Would the Applicant explain how these restrictions will be delivered?</p> <p>c) If cycling provision is to be made outside the main carriageway, would the Applicant please explain what assessment has been made of likely levels of usage and potential for modal conflict.</p> <p>d) Please explain what design parameters, including, but not restricted to, width of route and design speed, have been used for off-carriageway routes and reasons for selecting those parameters.</p> <p>e) Do the local authorities and local highway authorities have any comments on the adequacy of this level of provision to cater for cycling demand on the local network and the support it provides for alternative modes of transport to the private car?</p>	The scheme connects to the existing national cycle network and Trans-Pennine Trail at Brookfield. The Borough Council's forthcoming masterplan will explore further opportunities to support walking and cycling connections around Glossopdale and the scheme. Please refer to any comments from Derbyshire County Council in relation to the suitability of the design of cycling infrastructure.	Please refer to National Highways' response on the joint Derbyshire County Council and High Peak Borough Council Local Impact Report (TR010034/EXAM/9.37).
3.18	<p>These documents provide conflicting information in regard to minimum overhead clearances.</p> <p>a) Would the Applicant please clarify which information is correct?</p> <p>b) Is the proposed overhead clearance to the Public Right of Way appropriate?</p>	The Borough Council is not in a position to comment on this matter.	
3.19	Traffic flows crossing the Peak District on the A628 Woodhead Road and A57 Snake Road are anticipated to increase if the development proposal is	High Peak Borough Council is not the local planning authority in the Peak District National Park where rights of way such as the Trans-Pennine Trail and Pennine Way cross the identified highways. However, as a point of principle the safety of trail users should be	

Question Number	Question	IP Response	National Highways Response
	<p>implemented. Several Public Rights of Waycross these motor traffic routes.</p> <p>a)Has any statistical or other analysis of the comparison between the “Do-Minimum” and “Do Something” options of the distribution of acceptable gaps for pedestrians to cross the road beenmade?</p> <p>b)Do the local authorities and local highway authorities have any comments?</p>	<p>considered and any arising issues should be addressed as part of the mitigation of impacts of the scheme.</p>	
3.29	<p>It is stated that operations of limited durations might take place outside of the core working hours, as defined in the dDCO due to safety requirements.</p> <p>a) Please could the Applicant:</p> <ul style="list-style-type: none"> justify the need for such working; summarise the predicted impacts; and clarify the mechanism for agreement of such exceptional working how this is secured through the dDCO? <p>b) Please could the local authorities and local highway authorities comment?</p>	<p>It is noted that any works outside of the core hours would be agreed with the local environmental health officers.</p>	
3.31	<p>a) How will the needs of vulnerable users traversing the works be assessed?</p> <p>b) Please could the local authorities and local highway authorities comment?</p>	<p>Please refer to comments from the relevant highways authorities for technical feedback but as a point of principle the needs of vulnerable users should be properly assessed and taken into account with any works.</p>	
3.34	<p>a) Has any assessment been made of the impact of the proposed Outline Traffic Management Plan on bus services?</p> <p>b) Please could the local authorities and local highway authorities comment?</p>	<p>Bus services connecting Glossopdale with Greater Manchester are essential for residents who need to access healthcare, education and employment opportunities. Please refer to comments from the relevant highways authorities for technical feedback but as a matter of principle disruption to services should be minimised as far as possible.</p>	
4.1	<p>Section 7.5 of the Case for the Scheme sets out the Applicants position regarding Green Belt policy implications of the Proposed Development.</p> <p>a) Please set out whether you consider that all elements of the scheme (for both the construction and operation phases) do not constitute inappropriate development in the Green Belt. If this is not the case, please list all the elements that are considered inappropriate development.</p> <p>b) Paragraphs 7.5.6 and 7.5.9 of the Case for the Scheme refer to paragraph 150 of the NPPF which sets out that certain developments are not inappropriate in the Green Belt provided they preserve its openness. Please explain in further detail the effect of the scheme on the openness of the Green Belt having regard to both visual and spatial aspects as well as submissions received that</p>	<p>Whilst Paragraph 7.3.15 and Figure 7-1 of the Case for the Scheme appear to acknowledge that the scheme within the High Peak is also within the Green Belt, the subsequent consideration of Green Belt policy in Section 7.5 only references the Tameside UDP and NPPF. High Peak Local Plan Policy EQ4 (Green Belt Development) should also be addressed.</p>	<p>The Tameside UDP is specifically referenced as it contains policy that supports the location of the Scheme insofar as it lies within Tameside’s boundary. Policy EQ4 is addressed in the table at 1.3 within Appendix A of the Case for the Scheme (REP2-016).</p> <p>As the NPS NN is the primary decision-making framework for the Application , section 7.5 of REP2-016 primarily refers to the section of the NN NPS relating to the Green Belt, along with the NPPF. Policy EQ4 reflects the NPPF and states that “<i>Within the Green Belt, planning permission will not be granted for development unless it is in accordance with national planning policy</i>”. The Scheme is considered to be in accordance with National Policy as regards to development within the Green Belt.</p>

Question Number	Question	IP Response	National Highways Response
	the scheme would cut the Green Belt in half. c) Tameside Metropolitan Borough Council's comments are requested on the Applicant's Green Belt assessment. Where there are areas of disagreement, please explain why.		
5.22	As above, the delivery of good design is an aspiration of the NPSNN and government. a) At what stage will details of finishes to the scheme, street furniture and other hard landscaping be provided? b) Should the proposed finishes and street furniture, etc. be agreed with the local authorities and local highway authorities? c) How would such agreement be reached?	The Borough Council would welcome the opportunity to review details as appropriate.	
5.23	In the context of NPSNN Paragraphs 4.28-4.35 and 5.160 please explain how the design of Proposed Development meets the Design Principles for National Infrastructure in respect of Climate, Places, People and Value and the National Design Guide in respect of Climate, Character and Community in during construction and operation. a) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the Proposed Development into the landscape is achieved in the detailed design, construction and operation of the Proposed Development. b) How might they be secured? c) Are any further measures appropriate? • A "design champion" to advise on the quality of sustainable design and the spatial integration of the works; • A "design review panel" to provide informed "critical-friend" comment on the developing sustainable design proposals; • An approved "design code" or "design approach document" to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design; • An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees. d) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?	Yes. The Borough Council would welcome the opportunity to review further details when available.	

Question Number	Question	IP Response	National Highways Response
6.4	<p>When referring to designated heritage assets, the NPPF only identifies two levels of harm, substantial and less than substantial. Table 6.3, which sets out the factors in assessing the magnitude of impact, also identifies limited harm.</p> <p>a) Applicant - Please set out whether limited harm should be qualified as less than substantial in terms of the NPPF tests? If not, please explain how limited harm should be considered against paragraph 199 of the NPPF which states that great weight should be given to an asset's conservation irrespective of whether any potential harm amounts to substantial, total loss or less than substantial harm to its significance.</p> <p>b) Historic England, Derbyshire County Council, High Peak Borough Council and Tameside Metropolitan Borough Council – Do you have any comments on the use of limited harm given the tests sets out in the NPPF?</p>	It would be helpful if the terminology used in applicant's consideration of harm to heritage assets was consistent with the tests set out in the NPPF.	<p>a) As identified in the recent judgement in the case of R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited, it is recognised that a broad spectrum of harm may be covered within the categories of substantial and less than substantial harm.</p> <p>Limited harm, as identified in Table 6-3 (REP1-015), is therefore understood to constitute less than substantial harm.</p> <p>The assessment of limited harm will be a consideration when assessing the weight to be given to conservation of a heritage asset under paragraph 5.132 of the NPSNN and paragraph 199 of the NPPF. In this exercise, limited harm would be considered to fall at the lower end of the spectrum of less than substantial harm.</p>
6.7	The excavation of the Mottram Underpass cutting would result in the partial truncation of the former grounds of Mottram Old Hall. Do you consider that the parkland contributes to the significance of this designated heritage asset?	The asset is outside of High Peak. No further comment.	
6.8	<p>The Peak District National Park Authority identified in its RR that heritage assets are a part of the attraction of the PDNP and has raised concerns in relation to the impact on the Tintwistle Conservation Area and several heritage assets and their landscape setting.</p> <p>a) Peak District National Park Authority – please set out whether you consider that the adverse impact on the experience of the TWA arising as a result of increased traffic would cause harm to the significance of the heritage asset. If A Conservation Area Appraisal is available, please can you submit this into the Examination.</p> <p>b) Applicant - please comment on the Peak District National Park Authority's assertion that the increase in traffic within the Tintwistle Conservation Area would have an adverse impact on how the Conservation Area is experienced.</p>	A Conservation Area Character Appraisal for the part of the Conservation Area outside of the National Park has been adopted by High Peak Borough Council and is available online -	As referenced in paragraph 3.2.1 of ES Chapter 6 Cultural Heritage (REP1-015) the High Peak Borough Council Tintwistle Conservation Area Appraisal formed part of the baseline desk-based review of data.
7.3	Paragraph 5.4.5 of ES Chapter 5 [APP-061] states that the air quality model used in the assessment does not include terrain and that specific conditions such as valleys have	It is not entirely clear what the applicant is referring too here. The choice and application of gradient in the localised model setup is not clear. The only noted gradient affect appears to have been applied to	A response is provided in National Highways response to First Written Question 7.3 (REP2-021) and National Highways response to High Peak Borough Council Local Impacts Report paragraph 8.42.

Question Number	Question	IP Response	National Highways Response
	<p>been addressed through “localised model validation zones”.</p> <p>a) Please could the Applicant provide detail of the methodology and justify why it is appropriate for the terrain in the study area?</p> <p>b) Please could the local authorities comment?</p>	<p>Glossop Road at the Dinting Vale junction. It is not clear if a gradient has been applied to the modelling through Tintwistle on the A628, where it is expected that slow moving HGVs travelling up the gradient are likely to contribute a large proportion of emissions to this area.</p>	
7.4	<p>Paragraph 5.12.10 of ES Chapter 5 [APP-061] states that the Greater Manchester Clean Air Zone has not been considered in the traffic or air quality monitoring. It states that not including the assessment is a worst-case as the Clean Air Zone would bring about further improvements in concentration of annual mean NO2.</p> <p>a) Please could the Applicant provide further justification that the assessment represents a worst case for all receptors. Is there any potential for the introduction of the Clean Air Zone to result in changes in traffic patterns?</p> <p>b) Please could the local highway authorities comment?</p>	<p>As the Strategic Road Network (SRN) is currently exempt from the GMCAZ there may be a risk of “rat runs” being created through Glossop if the SRN offers a means for drivers to avoid a charge in Greater Manchester by diverting their route to join the SRN in High Peak.</p>	<p>As set out in National Highways response to First Written Question 7.4 (REP2-021), it is currently the Government’s intention that A57 and A628 are included within the CAZ.</p>
7.6	<p>Do the local authorities have any outstanding concerns regarding the study area, baseline conditions or the overall assessment methodology? How should any outstanding concerns be addressed?</p>	<p>Study Area:</p> <p>Yes, neither of the AQMA’s within the HPBC were included in the study area.</p> <p>The air quality study has been defined an Affected Road Network (ARN) which is determined by roads meeting the traffic screening criteria in the DMRB LA105 document. These criteria include ;</p> <ul style="list-style-type: none"> Daily traffic flows (two way) will change by 1,000 annual average daily traffic (AADT) or more; or Heavy Duty Vehicle (HDV) flows (two way) will change by 200 AADT or more; or <p>The screening out of the AQMA’s occurred as the TA indicated that the location of the AQMA’s did not meet the above criteria and is therefore, ultimately by the accuracy of this TA prediction.</p> <p>A major assumption in this TA is that traffic along Dinting Vale will only increase by 300ADDT, meaning AQMA 2 (Dinting Vale) did not meet the screening criteria, despite the adjoining road (Brookfield south) meeting the criteria on the assumption that the “extra” traffic will use alternative routes (essentially Shaw lane)</p> <p>With regard to AQMA 1: Tintwistle; TA data, indicates an increase of 950 ADDT, which is below the screening criteria (subject to the accuracy of this prediction). Nevertheless, part of this road was included in the study area and highly focused on (with 143 of the 181 modelled receptors in HPBC along this road) . However, it is not clear why, given this welcomed inclusion of the A628 in the ARN, that it did also not include AQMA 1, with the ARN stopping just short of this location (R573, receptor being the furthest east).</p> <p>Baseline conditions & model verification:</p> <p>“The assessment states that the annual mean NO2 concentrations for the base year have been verified by means of comparison against</p>	<p>Study Area</p> <p>See National Highways response above to High Peak Borough Council's response to Question 2.3b.</p> <p>Regarding the screening of areas using traffic thresholds, all traffic forecasts used in scheme assessment and appraisal are recognised as being estimates with an inherent level of confidence associated. To increase confidence for AQ screening, traffic flows are aggregated into combined directions and quoted as daily flows. The LA105 Guidance regarding the choice of the threshold has the associated note: "The 1,000 vehicles and 200 HDVs represent the lowest threshold above which the traffic model can represent change in traffic conditions to a reasonable level of confidence." Hence the change identified is the lowest daily flow threshold where the difference in modelled flow recorded is deemed sufficiently reliable to be confident there will be a change, rather than the change in modelled flow being insignificant.</p> <p>Background</p> <p>A response is provided in National Highways response High Peak Borough Council Local Impacts Report paragraph 8.39.</p> <p>Baseline conditions & model verification</p> <p>Verification against multiple datasets – justification</p> <p>Although multiple monitoring datasets have been used in model verification the Applicant does not agree that it inherently affects the reliability of the model. Given the size of the air quality model study area it was essential to reference several monitoring datasets to provide a suitable number of monitoring sites for model verification in each geographical area. Where there were multiple sites from different surveys in the same location these were carefully considered as to which site was both, most representative of base year concentrations at relevant receptor locations, and which data was most reliable considering the data capture, year of collection and knowledge of specific siting.</p>

Question Number	Question	IP Response	National Highways Response																		
		<p>available ratified monitoring data”.</p> <p>Ideally, a model predictions are verified against actual data collected in the same year (e.g 2018), as verification against adjusted data and multiple data sources adds further variability that will affect the reliability of the model.</p> <p>In this instance, verification of the model was undertaken using 3 sets of data in the following order of hierarchy;</p> <ul style="list-style-type: none">• Scheme specific TPU survey monitoring with data capture greater than 25% was used in preference to HPBC 2018 survey data• HPBC High 2018 survey data was used in preference MMLR survey data (which was projected forward from 2015-2016)• MMLR survey data was used in preference to TPU survey data where the data capture for the TPU survey data was 25% or less** <p>**It is presumed that the latter statement refers to sites outside of HPBC (or it is confusing)</p> <p>However, the above noted, in the Air Quality Baseline report (appendix 5.4) it states that</p> <p>“The 2019 data was bias adjusted and annualised to 2018 to use for model verification”. ...”the 2019 survey data was used in preference to the 2018 survey data as the annual data capture was higher and more locations had been included in the survey”.</p> <p>Therefore, its is slightly unclear what actual data was used in model verification; annualised 2018 data (>25% data capture) or 2019 data that had been “back annualised” to provide 2018 data.</p> <p>In addition, it appears that in the majority of cases, the 2018 “back annualised data (6.5 Environmental Statement Appendix 5.4 Air Quality Baseline Table A-2: TPU Monitoring Survey 2019 Raw Data) predicted a lower Annual Average NO2 concentration than the actual collected 2019 data, indicating that NO2 levels generally increased between 2018 – 2019.,</p> <p>This is considered unusual and would appear contra to other statements within report (s) noting a general downward trend Annual Average NO2 concentrations. It also does not follow the trend shown by the majority (* the exception being HP27), of the HPBC data used in the model validation, which showed a decrease. E.g</p> <table><tr><td>ID</td><td>2018</td><td>2019</td></tr><tr><td>HP1</td><td>22.9</td><td>19.6</td></tr><tr><td>HP14</td><td>24.1</td><td>23.0</td></tr><tr><td>HP20</td><td>28.4</td><td>26.3</td></tr><tr><td>HP24</td><td>29.8</td><td>29.4</td></tr><tr><td>HP26</td><td>34.5</td><td>30.8</td></tr></table>	ID	2018	2019	HP1	22.9	19.6	HP14	24.1	23.0	HP20	28.4	26.3	HP24	29.8	29.4	HP26	34.5	30.8	<p>Hierarchy – explanation & Clarification of data used</p> <p>Monitoring data used in model verification has been adjusted to 2018 (the year used for air quality model verification) using the annualisation method described in Defra Local Air Quality Management Technical guidance (LAQM.TG.16, Feb 2018 (the current version at the time of the assessment)).</p> <p>Table A-5 in Appendix 5.3 of the ES (APP-157) provides a list of all sites used within the verification process. As stated, the air quality monitoring data for 2018 used for air quality model verification has come from a number of sources:</p> <ul style="list-style-type: none">• For sites operated by local authorities these are the actual data for 2018 (no annualisation).• For historic scheme specific surveys (undertaken in 2015 and 2016) data was projected forwards to 2018 (referred to as the MMLR and M60J24J27 surveys)• The most recent scheme specific survey (referred to as the TPU survey) started in July 2018 and was extended to include additional sites in August 2019 (and continued until the end of December 2021). 2019 monitoring comprised a complete year of data, so monitoring for 2019 was projected back to 2018 to be used in verification. The 2019 data projected back to 2018 was used in preference to the data collected in 2018, which was for a maximum of 5 months, for all TPU sites. <p>The latter point highlighted by HPBC refers only to the use of MMLR data in preference to TPU survey data. No MMLR survey data was used in the verification in preference to HPBC data.</p> <p>2018 vs 2019</p> <p>The projection of the scheme specific survey data back from 2019 to 2018 did result in some sites with a lower concentration in 2018 than 2019. This is considered in Chapter 5 of the ES (REP2-006) paragraph 5.6.19. The scheme specific survey data presented in Chapter 5 of the ES (REP2-006) are only for sites adjacent to road links that met the traffic screening criteria in National Highways DMRB LA105 air quality guidance (those within the air quality study area). The sites included are a sub set of those in the full survey. When comparing the survey period mean (2019) to the calculated annualised and adjusted 2018 annual mean the following resulted in the lower 2018 annual mean:</p> <ul style="list-style-type: none">• Background CMS sites used in the adjustment measured higher actual annual mean concentrations in 2019 than in 2018. This is also true of all background CMS sites in the Greater Manchester area.• The resulting factor to adjust from 2019 to 2018 are thus less than 1, which makes the 2018 concentrations lower.• Sites did not typically have 100% data capture, which affected the factor applied to adjust to 2018.• 2018 concentrations are time weighted (i.e. each concentration is multiplied by the time the tubes were out) as the DEFRA’s calendar
ID	2018	2019																			
HP1	22.9	19.6																			
HP14	24.1	23.0																			
HP20	28.4	26.3																			
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		<table><tr><td>*HP27</td><td>32.7</td><td>33.8</td></tr><tr><td>HP29</td><td>30.7</td><td>27.3</td></tr><tr><td>HP30</td><td>28.3</td><td>27.3</td></tr><tr><td>HP31</td><td>37.8</td><td>35.9</td></tr><tr><td>HP29</td><td>30.7</td><td>27.3</td></tr></table> <p>**This can be highlighted further by reference to HP25 (Dinting Vale junction), which was omitted from the model validation in preference to TPU1, TPU17, TPU16, and TPU20 which are all in a similar location (ES Statement fig 5.1). Data from both actual 2019 collected data (HPBC v TPU) in 2019 are comparable, whereas the “back annualised 2018 TPU data seems low compared to the collected HPBC data?</p> <table><tr><td>ID</td><td>2018</td><td>2019</td></tr><tr><td>HP25**</td><td>53.6</td><td>46.3</td></tr><tr><td>TPU1</td><td>43</td><td>45.1</td></tr><tr><td>TPU16</td><td>35.5</td><td>37.1</td></tr><tr><td>TPU17</td><td>43.5</td><td>44</td></tr><tr><td>TPU17</td><td>41.4</td><td>45.3</td></tr></table> <p>This needs to be clarified by the applicant as model verification against possibly lower than actual NO2 levels could ultimately lead to an underprediction by the model.</p> <p>The initial overall performance of the model was consider below the acceptable level (RMSE is 15.1 µg/m3 or ±37%) and this was adjusted by the adoption of 9 different correction factors based on locations.</p> <p>Whilst correction factors factors are a recognised and are appropriate, LAQM (TG16) also recommends that if the RMSE values are higher than ±25% , the model inputs and verification should be revisited in order to make improvements e.g.</p> <ul style="list-style-type: none">• Checks on traffic data; speed, profile, numbers• Consideration of source type, such as roads and street canyons;• Checks on estimates of background concentrations; and• Checks on the monitoring data <p>It is not clear if this occurred so further clarification on this would be beneficial.</p> <p>As noted earlier, the assessment states that the air quality model used in the assessment does not include terrain and that specific conditions such as valleys have been addressed through “localised</p>	*HP27	32.7	33.8	HP29	30.7	27.3	HP30	28.3	27.3	HP31	37.8	35.9	HP29	30.7	27.3	ID	2018	2019	HP25**	53.6	46.3	TPU1	43	45.1	TPU16	35.5	37.1	TPU17	43.5	44	TPU17	41.4	45.3	<p>has not been completely followed, which is the recommended approach in Defra Local Air Quality Management Technical guidance (LAQM.TG.16, Feb 2018). This approach might also result in lower concentrations at certain locations (especially if they have low data capture).</p> <p>Modelling future air quality is inherently uncertain, as noted in section 5.4 of Chapter 5 of the ES (REP2-006), not least in part due to the use of historical meteorological data to estimate future concentrations for an opening year. As shown in background CMS monitoring within the Greater Manchester area (GMCA 2019 Air Quality Annual Status Report), 2018 represented a meteorological year which resulted in lower annul mean background NO₂ concentrations than long term national trends would predict. It is important to account for this in the 2018 back projected scheme specific survey data otherwise modelled future concentrations would be overly conservative. Although all the 2018 and 2019 data does not fit the general downward trend in NO₂ concentrations, this does not negate the long-term national trend in background concentration reduction or predicted improvement in future vehicle emissions, as a result of the switch to low and zero tailpipe emission vehicles.</p> <p>Dinting Junction data analysis</p> <p>Table A-5 in Appendix 5.3 of the ES (APP-157) provides a list of the monitoring sites not included in the verification and the reason for the exclusion including where sites in the same or similar location were excluded in preference to other survey data. As stated HP25 was excluded in preference to TPU17 (the closest TPU site to HP25) given the exact height of TPU17 was known and monitoring data for the TPU17 site was in line with other sites in the zone, whereas HP25 was not.</p> <p>When monthly data for HP25 was reviewed it was noted that includes a June 2018 concentration which was double the average concentration of all other months (110.9 µg/m³). No other diffusion tube in the HPDC survey appear to have an abnormally high result for June 2018. This potentially erroneous data was taken into consideration and given TPU data was monitored in triplicate the annual mean concentration for TPU17 was considered to be more reliable.</p> <p>Model improvement before verification</p> <p>The method has included verification of the results of the dispersion modelling by comparison with monitoring data to ensure that final modelled concentrations are representative of the monitoring in the local area. Where there are differences greater than 25% between the modelled and monitored concentrations at many sites, or where there is a systematic bias in the comparison then model adjustment is undertaken. As stated, this can either be through revisiting model assumptions or adjustment of the model to bring results in line with real world data. Model assumptions were revisited prior to the final model verification and adjustment process. This included:</p> <ul style="list-style-type: none">• Detailed checks on traffic data and speed band selection.• Comparison of Defra’s background maps (2018 reference year) with monitored data at background monitoring sites within and around
*HP27	32.7	33.8																																		
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Question Number	Question	IP Response	National Highways Response																																				
		<p>model validation zones”.</p> <p>It would be beneficial to understand the model inputs and verification were revisited prior to the application of the correction factors (e.g. are the correction factors essentially the localised model validation zones). should be revisited if these were applied pre or post the initial model verification process and were consistent with the 9 different correction factors.</p> <p>Once the correction factors were applied the overall performance the RMSE of the model was 4.81 (±12%) which is a big improvement but still slightly above the ideal RMSE of 4 (10%) of the air quality objective LAQM (TG16).</p> <p>Given that 9 different correction factors were applied though it would also be useful to present the RMSE of the 9 different correction factors used, to see if the model varied in accuracy between localised model validation zones).</p> <p>Background</p> <p>The assessment states that the comparison between modelled and monitored for NO2 and PM10 concentrations were within 30% of the monitored concentrations and no adjustment was applied. If background concentrations are underpredicted by up to 30% then the verification factor is likely to be high. This will then affect the results of the assessment.</p>	<p>the air quality study area for the Scheme to confirm they were suitable to use in the assessment without adjustment.</p> <ul style="list-style-type: none">• Review of suitability of monitoring data for inclusion in model verification.• Checks of annualisation methodology and bias adjustment applied to raw monitoring data.• Confirmation, as far as possible, of the exact location of monitoring sites used in model verification to ensure geographical representation of road sources and monitoring sites was as accurate as possible in the model.• Consideration of the inclusion of street canyons in the model.• The inclusion of factored emission rates to account for road gradients greater than 6%. <p>Adjustment was subsequently undertaken for “localised model validation zones”, i.e. the model area has been split into a number of individual zones to allow localised factors to be accounted for within each zone. The “localised model validation zones” include the sections of roads where gradient effects were accounted for in the emissions calculations as adjustment was still required to further bring the modelling results in line with real world data.</p> <p>RMSE</p> <p>The RMSE for the pre and post adjustment of the nine localised model validation zones are provided in the table below. All zones have a post adjustment RMSE below the overall model RMSE of 4.81µg/m³ with the exception of zone 5 Mottram North of A57 and zone 7 Mottram Rise. Zone 7 Mottram Rise has an RMSE just above the overall model RMSE of 4.88µg/m³ however, zone 5 Mottram North of A57 has a higher RMSE of 7.75µg/m³. Although an RMSE of less than 4µg/m³ is ideal, the Defra Local Air Quality Management Technical guidance (LAQM.TG.16, April 2021) states that an RMSE that is less than 25% of the objective being assessed, in this case 10µg/m³, is acceptable.</p> <table><tr><th>Zone</th><th>Zone Name</th><th>Pre adjustment RMSE (µg/m³)</th><th>Post adjustment RMSE(µg/m³)</th></tr><tr><td>1</td><td>A57</td><td>14.69</td><td>4.32</td></tr><tr><td>2</td><td>A628</td><td>12.05</td><td>4.72</td></tr><tr><td>3</td><td>Dinting Vale Junction</td><td>21.41</td><td>1.98</td></tr><tr><td>4</td><td>M67</td><td>5.24</td><td>3.75</td></tr><tr><td>5</td><td>Mottram North of A57</td><td>15.45</td><td>7.75</td></tr><tr><td>6</td><td>Mottram South of A57</td><td>31.60</td><td>4.72</td></tr><tr><td>7</td><td>Mottram Rise</td><td>8.41</td><td>4.88</td></tr><tr><td>8</td><td>Non-A road / Suburban</td><td>5.71</td><td>4.24</td></tr></table>	Zone	Zone Name	Pre adjustment RMSE (µg/m ³)	Post adjustment RMSE(µg/m ³)	1	A57	14.69	4.32	2	A628	12.05	4.72	3	Dinting Vale Junction	21.41	1.98	4	M67	5.24	3.75	5	Mottram North of A57	15.45	7.75	6	Mottram South of A57	31.60	4.72	7	Mottram Rise	8.41	4.88	8	Non-A road / Suburban	5.71	4.24
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Question Number	Question	IP Response	National Highways Response			
			9	M60	4.65	No change – adjustment factor of 1 applied
7.8	<p>ES Chapter 5 [APP-061] and ES Appendix 4.1 [APP-152] do not explain whether the scoping out of a quantitative assessment of emissions from construction phase traffic has been discussed with relevant local authority environmental health officers, as requested in the Scoping Opinion [APP-152].</p> <p>Do the local authorities have any concerns about the scoping out of a quantitative assessment of emissions from construction phase traffic?</p>	<p>The assessment of construction phase traffic states that ‘expected numbers of construction vehicles’ have been screened against the DMRB LA 105 criteria. There is no confirmation that changes in speed bands have been included in the screening exercise. Also, no information is provided in the air quality chapter as to the number of additional construction vehicles predicted to be on the road.</p> <p>The chapter describes additional construction vehicles on the road network and the re-routing of existing vehicles due to traffic management measures. Both screening assessments conclude that the DMRB LA 105 criteria was not exceeded; however, confirmation would be required that both additional construction vehicles and traffic management measures were screened together as part of an overall construction phase assessment.</p>	Please see National Highways’ response to High Peak Borough Council Local Impact Report paragraphs 8.35 and 8.36.			
7.10	<p>a) To ensure that air quality is managed properly during pre-commencement activities, should Table 2.1 of the REAC include actions for controlling dust during construction and set out a process for dealing with air quality complaints?</p> <p>b) Should reference be made to following Institute of Air Quality Management’s Guidance on the Assessment of Dust from Demolition and Construction?</p>	Agreed				
7.11	<p>a) Should reference be made to following Institute of Air Quality Management’s Guidance on the Assessment of Dust from Demolition and Construction? If not, please could the Applicant set out any differences with its proposed approach?</p> <p>b) The list of dust control measures that may be included is high level and brief. Should more detail be provided to ensure consistency with the Environmental Statement, and should additional measures be identified for high-risk locations, including near sensitive receptors?</p> <p>c) Should actions be added for the control of emissions from construction vehicles and plant?</p> <p>d) Should actions be added for air quality monitoring and for a process for dealing with air quality complaints?</p>	Agreed				
7.12	<p>a) Do the local authorities or Natural England have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy for the construction phase? How should any outstanding concerns be addressed?</p> <p>b) With the secured mitigation measures in place, do the local authorities or Natural England consider that it is likely or unlikely that there would be any significant air</p>	<p>The construction phase dust assessment concludes that the scheme has a ‘large’ dust risk potential and therefore the sensitivity of the receiving environment is ‘high’. According to Table 2.58b of the DMRB LA 105, the sensitivity of the receiving environment is only considered to be ‘high’ for receptors within 100 m of the works and ‘low’ for receptors within 100 to 200 m of the works.</p> <p>The Melandra Castle and Railway LWS is located within 200 m of the site boundary and has not been considered in the construction dust assessment.</p>	A response is set out in National Highways response to High Peak Borough Council Local Impacts Report 8.33, 8.34 and 8.37.			

Question Number	Question	IP Response	National Highways Response
	quality effects during the construction phase?	<p>Monitoring during the construction phase is discussed in paragraph 5.8.1 which states that, if necessary, 'monitoring parameters and a programme will be established.' However, in Section 5.11 Monitoring, it contradicts this and states that 'given the scheme is not expected to have any significant adverse effects on air quality during the construction or operation, no further air quality monitoring is required.' It is recommended that monitoring is discussed with the local authority at high risk sites during the construction phase and that locations of higher risk are identified by the applicant.</p> <p>The chapter states that it is expected that standard industry best practice would mitigate the risk of construction dust in the majority of cases. It is recommended that additional mitigation measures are consulted upon with HPBC and agreed for high-risk areas. The applicant should identify where these may be.</p>	
7.14	<p>a) Do the local authorities or Natural England have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy for the operational phase? How should any outstanding concerns be addressed?</p> <p>b) With the secured mitigation measures in place, do the local authorities or Natural England consider that it is likely or unlikely that there would be any significant air quality effects during the operational phase?</p>	See response for 7.6. No mitigation for operational phase has been proposed.	
7.20	<p>The European Union Air Quality Directive implemented through the European Union (Withdrawal Agreement) Act 2020.</p> <p>Do the local authorities:</p> <p>a) have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring or compliance with policy with respect to AQD compliances and AQMAs;</p> <p>b) consider that the Proposed Development would, or would not, result in any area which is currently reported as being compliant with the Air Quality Directive becoming non-compliant;</p> <p>c) consider that the Proposed Development would, or would not, affect the ability of any non-compliant area to achieve compliance within the most recent reported timescales?</p>	Qualifying features for the compliance assessment and receptors considered in the local air quality assessment along the A57 Brookfield are expected to show a large increase in NO ₂ concentrations in the opening year. The qualifying features for the compliance assessment are not labelled on Figure 5.4.	<p>There are expected to be large increases in annual mean NO₂ concentrations at qualifying features and public access locations along the A57 Brookfield in the Scheme opening year (2025). However, all these locations are expected to have annual mean concentrations well below the NO₂ limit value of 40µg/m³ in 2025 both with and without the Scheme. The A57 Brookfield is therefore not considered to be a risk to non-compliance with the Air Quality Directive.</p> <p>The compliance assessment modelling results provided in the ES Chapter 5 (REP2-006) at paragraphs 5.7.25 to 5.7.30 and provided in Appendix 5.5 Table A-6 (APP-159) show that the Scheme would not result in an increase in concentrations of annual mean NO₂ where there are existing exceedances of the annual mean NO₂ limit value, nor would there be any new exceedances of the annual mean NO₂ limit value be introduced by the Scheme. Consequently, the Scheme is not considered to be a risk to non-compliance with the Air Quality Directive in any area.</p> <p>Given the number of qualifying features and public access receptors included in the compliance assessment it was not possible to practically label them in ES Figure 5.4 (APP-080) however, grid references and location descriptors including local authority and verification zone are included in Appendix 5.5 Table A-6 (APP-159).</p>
8.1	Section 14.2 of ES Chapter 14 [REP1-019] sets out relevant international, national, and local policies, the UK's carbon reduction targets and carbon budgets, and the Applicant's commentary on the requirements and	Baseline surveys have been undertaken at nine locations considered representative of noise sensitive receptors across the scheme. To enable the assessment of construction noise, baseline noise levels have been identified at each of the key receptor locations using the	Please see National Highways response to High Peak Borough Council's Local Impact Report submitted at Deadline 3 (TR010034/EXAM/9.37).

Question Number	Question	IP Response	National Highways Response
	<p>implications for the Proposed Development.</p> <p>a) Are there any other key matters that should be added to the Applicant's commentaries on the legislation and policies?</p> <p>b) Is there any other important or relevant legislation or policy that the ExA should consider?</p> <p>c) Are there any other carbon reduction targets or carbon budgets that are relevant to the Proposed Development and for which there is a clear legal or policy basis for them to be considered?</p> <p>d) Should any UK case law/ court judgements be identified?</p> <p>e) Do National Highways have any carbon reduction targets that have not been published and/ or that it intends to apply on the Proposed Development?</p> <p>When responding please, where possible, explain why your comments relevant to the Proposed Development and to the ExA's consideration of it.</p>	<p>baseline noise survey data and Defra strategic noise mapping for locations not covered by the baseline noise survey.</p> <p>It is noted that no baseline noise surveys were undertaken with the HPBC area. Table 1-6 'Summary of consultation' of the ES Chapter 1 states 'monitoring is only to inform the construction noise assessment rather than operation and the locations proposed are designed to obtain a representative of the baseline noise in areas where construction noise has the potential to be significant.' However four sample construction receptors are located within the HPBC area, two of which (18 and 54 Woolley Bridge) have been assigned a SOAEL of 75 dB LAeq,T for daytime based on the daytime baseline noise levels derived from Defra strategic mapping. It is recommended that further monitoring is undertaken to confirm the existing baseline noise levels as part of the EMP for the scheme to ensure that sensitive receptors in the HPBC area are correctly assigned construction noise limit values.</p> <p>The ES refers to the references to climate change in the High Peak Borough Council Corporate Plan. It could also reference the Council's declaration of a climate emergency which includes a pledge to "make High Peak Borough Council carbon neutral in its internal operations and the services it delivers by 2030, and work with partners to achieve this target across High Peak." A Part 1 Action Plan which sets out how the Council's own operations will achieve this has been agreed. A Part 2 Action Plan on how we will work with others is in preparation.</p>	
9.1	What existing noise issues associated with Noise Important Areas have been identified and has the Proposed Development taken opportunities to address them?	Noise important areas are were identified by Defra, via strategic noise mapping. The source of the noise associated with Noise Important Areas identified in HPBC assessment was road traffic.	
9.4	<p>Are the local authorities satisfied with the approach with respect to:</p> <p>a) the study area;</p> <p>b) the receptors selected for the assessment and whether they are considered representative;</p> <p>c) the baseline noise surveys;</p> <p>d) the definitions of LOAEL and SOAEL;</p> <p>e) the definitions of magnitudes of impact; and</p> <p>f) the criteria used to define significance of impact?</p> <p>How should any outstanding concerns be addressed?</p>	<p>Baseline surveys have been undertaken at nine locations considered representative of noise sensitive receptors across the scheme. To enable the assessment of construction noise, baseline noise levels have been identified at each of the key receptor locations using the baseline noise survey data and Defra strategic noise mapping for locations not covered by the baseline noise survey.</p> <p>It is noted that no baseline noise surveys were undertaken with the HPBC area. Table 1-6 'Summary of consultation' of the ES Chapter 1 states 'monitoring is only to inform the construction noise assessment rather than operation and the locations proposed are designed to obtain a representative of the baseline noise in areas where construction noise has the potential to be significant.' However four sample construction receptors are located within the HPBC area, two of which (18 and 54 Woolley Bridge) have been assigned a SOAEL of 75 dB LAeq,T for daytime based on the daytime baseline noise levels derived from Defra strategic mapping. It is recommended that further monitoring is undertaken to confirm the existing baseline noise levels as part of the EMP for the scheme to ensure that sensitive receptors in the HPBC area are correctly assigned construction noise limit values.</p>	Please see National Highways response to High Peak Borough Council's Local Impact Report submitted at Deadline 3 (TR010034/EXAM/9.37).

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9.7	<p>ES Chapter 11 and the REAC refer to the potential for later seeking Section 61 consent for some or all the construction works.</p> <p>a) How can it be ensured that this will not give rise to any materially new or materially worse environmental effects in comparison with those reported in the environmental statement?</p> <p>b) The assessment states that “no night works are anticipated with the exception of traffic management”. Should Section 61 consent be required for any night time works apart from traffic management?</p>	<p>Please refer to question 1.34 regarding working hours.</p> <p>a) In principle a Section 61 (COPA, 1974) consent should not give rise to any additional negative effects. A Section 61 consent is often sought to carry out works, which are likely to have a significant impact on the neighbourhood due to its generation of noise and vibration. A section 61 application should outline the works which are planned to take place, the working hours of the site, monitoring, and a plan to mitigate potential noise and vibration impact which should be inline with best practical means (BPM).</p> <p>b) It is hoped that night time work is not required but it would be anticipated that the applicant would apply for Section 61 (demonstrating adherence to BPM) should a compelling need arise.</p>	
9.11	<p>To ensure that noise and vibration are managed properly during pre- commencement activities, should Table 2.1 of the REAC include for:</p> <p>a) a pre-commencement noise and vibration plan;</p> <p>b) Best Practicable Means, noise insulation and temporary re-housing;</p> <p>c) the application of vibration management guidance and protection of buildings from disturbance or damage;</p> <p>d) noise and vibration monitoring; and</p> <p>e) a noise and vibration complaints process?</p>	Agreed.	
9.12	<p>To ensure that noise and vibration are managed properly during the construction phase, should Table 2.1 of the REAC include for:</p> <p>a) the application of vibration management guidance and protection of buildings from disturbance or damage;</p> <p>b) noise and vibration monitoring; and</p> <p>c) a noise and vibration complaints process?</p>	Agreed.	
9.16	Do the local authorities have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy for the construction phase? How should any outstanding concerns be addressed?	See response to 9.4.	
9.21	Do the local authorities have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy for the operational phase? How should any outstanding concerns be addressed?	The ES states the operational noise assessment has been undertaken in accordance with DMRB LA 111. Appendix 11.4 states that the ‘worst affected façade and floor of the noise sensitive properties was the one where the least beneficial change in noise levels were predicted’. This was the guidance in the now superseded version of DMRB HD 213/11. The guidance in paragraph 3.53 of DMRB LA 111 states the façade used to calculate the noise change shall be chosen as that with the greatest magnitude of noise change. Therefore, clarification is required to confirm the method used to	Please see National Highways response to High Peak Borough Council’s Local Impact Report submitted at Deadline 3 (TR010034/EXAM/9.37).

Question Number	Question	IP Response	National Highways Response
		<p>select the façade point used in the assessment.</p> <p>Table 11.35 of the ES has been used to identify the number of properties which are predicted to experience significant adverse effects. The total number of properties predicted to experience operational significant adverse effects within the HPBC area is not clear.</p> <p>With regards to the operational wider study area, it is not clear where the 'perceptible' increases in road traffic noise are located or if any of these fall within the HPBC area. There is no assessment or statement within the ES regarding whether any of these perceptible increases in the wider study area are classified as significant effects.</p>	
13.6	Do the local authorities have any comments on the Economic Assessment that has been carried out in respect of the Scheme?	<p>The economic assessment should consider the local economic impacts in more detail. Our Local Impact Report identifies the likelihood that businesses that are dependant on local travel within Glossopdale are likely to suffer from increased delays and journey times due to the additional traffic arising from the scheme. Conversely, businesses that are focused more on connections to Greater Manchester and the strategic road network may benefit from reduced journey times overall</p>	Please see National Highways response to High Peak Borough Council's Local Impact Report submitted at Deadline 3 (TR010034/EXAM/9.37).
13.8	<p>a) Is there any evidence of environmental factors that are likely to be affected by the Proposed Development contributing to lower life expectancy in Hadfield North or Hadfield South than for England?</p> <p>b) Please could the Applicant advise how has this been considered in the assessment?</p>	<p>There is no strong evidence to support a singular causation for differences in life expectancy. The applicant notes that deaths for all ages and all persons from respiratory disease in Hadfield North is worse, though not significantly so to Derbyshire and England, while in Hadfield South it is marginally better. It is notable that in both Hadfield North and Hadfield South, behavioural risk factors such as smoking is lower than England. Decreases in Air Quality as a result of the development could have a negative affect on health. Human health is also considered in our Local Impact Report.</p>	
13.13	Do the local authorities have any comment with regard to the effects of the Proposed Development on human health?	Please refer to our Local Impact Report.	
13.16	<p>Are there any other comments with respect to:</p> <ul style="list-style-type: none"> • agricultural land or soils; • local social and economic impacts; • human health; • mitigation and opportunities for enhancement; and • any other policy and factual issues? 	Please refer to our Local Impact Report.	
14.1	The Applicant identifies the potential for the Proposed Development to create statutory nuisance in relation to smoke emitted from premises, dust, steam or effluvia arising on business premises, artificial light emitted from premises, noise emitted from premises and noise emitted from or caused by a vehicle, machinery or equipment in a street. It then states that with the mitigation measures secured by the EMP and REAC, Traffic management Plan and DCO, none of the statutory nuisances are predicted to	<p>Complying with best practical means contained within a DCO or Section 61 consent is an established defence for prosecution of Environmental Protection Act 1990 an established defence to prosecution</p>	

Question Number	Question	IP Response	National Highways Response
	<p>arise. The ES predicts significant noise and vibration effects during construction and operation.</p> <p>a) Are there any comments regarding the assessment of the potential for statutory nuisance?</p> <p>b) Are the dDCO provisions for defence to proceeding in respect of statutory nuisance necessary and appropriate?</p>		
14.3	<p>a) With reference to NPSNN, please could the Applicant summarise the steps taken to identify any potential effects on civil or military aviation and/or other defence assets and whether it considers that any are likely to be affected?</p> <p>b) If any may be affected, please could the Applicant summarise the consultations with the Ministry of Defence, Civil Aviation Authority, National Air Traffic Services and any aerodrome – licensed or otherwise – likely to be affected, and the proposed mitigation measures?</p> <p>c) Are the Local Authorities aware of any civil or military aviation and/or other defence assets that might be affected?</p>	The scheme is understood to fall within the Manchester Airport Consultation Zone relating to the flight path for aircraft.	
15.7	<p>Are the local planning authorities or local highway authorities aware of:</p> <p>a) any reasonable alternatives to any compulsory acquisition or temporary possession sought by the Applicant; or</p> <p>b) any areas of land or rights that the Applicant is seeking the powers to acquire that they consider are not needed?</p>	No.	
15.15	<p>Paragraph 7.2.3 of the Statement of Reasons [REP1-010] states that Special Parliamentary Procedure is not required for the acquisition of six open space plots as the plots “are required for the widening or drainage of an existing highway and the giving of land in exchange is unnecessary”.</p> <p>Please could the Applicant justify that statement with reference to s131(5) and s132(5) of the PA2008:</p> <p>a) what uses are proposed for the plots;</p> <p>b) are there any reasonable alternatives; and</p> <p>c) could the giving of other land in exchange be required “in the interests of the persons, if any, entitled to rights of common or other rights or in the interests of the public”?</p> <p>Please could the local planning authorities comment?</p>	The plots in question are understood to lie within Tameside. No further comment.	
15.16	Table 7.1 of the Statement of Reasons [REP1-010] identifies various land plots within the Order limits as open	None known.	

Question Number	Question	IP Response	National Highways Response
	space. Does any other land within the Order limits comprise land forming part of a common, open space or fuel or field garden allotment?		
15.19	a) Have potential impediments to the development been properly identified and addressed? b) Are there concerns that any matters either within or outside the scope of the dDCO for the development to become operational may not be satisfactorily resolved, including acquisitions, consents, resources or other agreements?	a) No comment b) None known.	

7. REP2-053 Natural England Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
1.32	<p>Requirements 3-11 Provision for consultation and agreement</p> <p>a) Please identify where it would be helpful for example, to bring clarity or to help avoid any later misunderstandings, for specific provisions to be included in any Requirement for consultation or agreement to be required with relevant bodies.</p> <p>In each case, please explain why the provisions should be included.</p>	<p>a) Under Natural England's remit, aside from National Highways consulting Natural England for a License for the relevant European and protected species Licensing, Natural England would not expect to be required to be consulted on other issues.</p> <p>However if further information comes forward that could lead to significant impact upon Internationally and Nationally Designated sites by any bodies then we would expect to be further consulted before any works take place.</p>	<p>No further information is expected to come forward that could lead to significant impact upon Internationally and Nationally Designated sites. However, should further information arise then Natural England would be consulted.</p>
1.40	<p>Requirement 7 Protected Species</p> <p>Should the requirement for "relevant parts of the relevant works must cease" include identification of the extent of works that must cease relative to the location or likely location of the protected species?</p> <p>Does Natural England have any other comments?</p>	<p>Natural England recommends the requirement includes identification of the extent of works that must cease relative to the location of the protected species AND likely location as identified in any survey data. It is further recommended that an Ecological Clerk of Works be used during the project to identify these locations.</p>	<p>The relevant part of the relevant works that are to cease are any works that affect a protected species shown to be present or where there is a reasonable likelihood of it being present, where a significant effect is likely to occur and the effects of the works are not addressed by any prior approved scheme. The extent of those works will be explicit from the pre-construction surveys (not before) and to the extent additional protective species are identified or effects have not been addressed they will be protected under the licensing requirements for the relevant European and protected species identified. National Highway's view is that no amendment is required to this Requirement.</p> <p>National Highways can confirm that an Ecological Clerk of Works will be used during the construction phase.</p>

8. REP2-054 Peak District National Park Authority Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
5.3	<p>Peak District National Park Dark Skies ES Chapter7 [APP-063]</p> <p>Paragraph 7.6.20 notes that consideration has been given to three areas within the Peak District National Park as “dark skies”, but these have been excluded from further assessment as the Proposed Development is unlikely to be visible from the sites.</p> <p>Is Peak District National Park Authority content that no further assessment is required?</p>	Dark Skies’– indirect effects of lighting of the scheme may have adverse effects on the appreciation of dark skies from within the Park, so no, we do not believe that the assessment has given this issue adequate weight within the assessment.	There are three areas designated by the Peak District National Park as ‘dark skies sites’. However, they are all outside of the study area and due to the distance (the nearest part of the Scheme to the nearest dark skies site is approximately 28km ranging to approximately 40km) the Scheme is unlikely to be visible from any of the ‘dark skies’ sites’. Therefore, we have given this issue adequate consideration within the assessment.
5.7	<p>Outstanding study area, baseline conditions and overall assessment methodology concerns</p> <p>a) Are the local authorities, Peak District National Park Authority and Natural England satisfied with the approach for landscape and visual with respect to:</p> <ul style="list-style-type: none"> the study area and visibility; the receptors selected for the assessment and whether they are representative; the definitions of value, significance, sensitivity and magnitude of impact; and the criteria used to define significant effect? <p>How should any outstanding concerns be addressed?</p>	a) No; as noted in section 8.2 of the Local Impact Report we do not believe that the baseline for the assessment has been adequately defined.	Please see National Highways’ response to Section 8.2 of the PDNPA Local Impact Report (LIR) which relates to issue with the baseline and definition of landscape receptors.
5.14	<p>Peak District National Park Indirect effects</p> <p>Is the Peak District National Park Authority content with the assessment of indirect effects on the Peak District National Park?</p>	As defined in more detail within the Local Impact Report we are not content that the assessment of indirect effects has been covered in adequate detail.	The Applicant has responded to the issues raised by the Peak District National Park Authority (PDNPA) in the Local Impact Report (LIR), in particular responses to paragraphs 8.2.3 and 8.2.4.
5.15	<p>Outstanding landscape impact assessment concerns ES Chapter 7 [APP-063] ES Chapter 16 [APP-072] REAC [REP1-037] Figure 2.4 Environmental Masterplan [APP-074]</p> <p>a) Do the local authorities, Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> the landscape and townscape impact assessment; mitigation measures including the REAC and Environmental Masterplan; whether a draft Landscape and Ecological Management Plan should be submitted to the Examination; 	<p>a) Yes</p> <p>b) Yes these matters are not considered adequately in the assessment–while I would not say that indirect landscape effects definitely would be significant, it is possible they might. The assessment methodology dismisses the potential significance of lower magnitudes of effect without giving them adequate consideration.</p> <p>A more refined study area, a more detailed methodology and assessment process where judgements are explained and justified is required by the applicant so the potential significance of indirect effects can be adequately considered within the decision-making process.</p>	The Applicant has responded to the issues raised by the Peak District National Park Authority (PDNPA) in the Local Impact Report (LIR). Please refer to paragraphs 8.2.18 to 8.2.21 of the LIR.

Question Number	Question	IP Response	National Highways Response
	Are there any reasons to question that there would be no significant effects on landscape or townscape character, other than the temporary effects identified in ES Chapter 16?		
5.19	<p>Outstanding visual impact assessment concerns ES Chapter 7 [APP-063] ES Chapter 16 [APP-072] REAC [REP1-037] Figure 2.4 Environmental Masterplan [APP-074]</p> <p>a) Do the local authorities or Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> the visual impact assessment; mitigation measures including the REAC and Environmental Masterplan; whether a draft Landscape and Ecological Management Plan should be submitted to the Examination; the maintenance regime, monitoring and remedial actions during operation; or compliance with policy? <p>b) Are there any reasons to question that there would be any significant visual effects other than those summarised in ES Chapter 16?</p> <p>How should any outstanding concerns be addressed?</p>	<p>a) Yes</p> <p>b) Yes; these matters are not considered adequately in the assessment – while I would not say that indirect visual effects definitely would be significant, it is possible they might. The assessment methodology dismisses the potential significance of lower magnitudes of effect without giving them adequate consideration.</p> <p>A more detailed methodology and assessment process where judgements are explained and justified is required by the applicant so the potential significance of indirect effects can be adequately considered within the decision-making process.</p>	<p>The Applicant has responded to the issues raised by the Peak District National Park Authority (PDNPA) in the Local Impact Report (LIR). Please refer to paragraphs 8.2.18 to 8.2.21 of the LIR.</p>
6.1	<p>ES Chapter 6 [REP1-015]</p> <p>Table 6.2 sets out the criteria to determine the value of heritage assets. Do you have any comments regarding the values placed on the designated heritage assets in this table?</p>	<p>We consider Grade II Listed Buildings and Grade II Registered Parks and Gardens to be of High Value - they are of national importance. Some archaeological remains are also of High importance, even if they are not scheduled.</p>	
7.14	<p>Outstanding concerns</p> <p>a) Do the local authorities or Natural England have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy for the operational phase? How should any outstanding concerns be addressed?</p> <p>With the secured mitigation measures in place, do the local authorities or Natural England consider that it is likely or unlikely that there would be any significant air quality effects during the operational phase?</p>	<p>a) We have concerns that the confidence limits for the traffic increase figures, in particular for the A628 and A57, could take the predicted figures over the 1000 AADT threshold, and that the potential for air quality impacts on the Blanket Bog and Upland Heathland habitats of the SAC have therefore erroneously been scoped out.</p> <p>Please see above</p>	<p>The traffic forecasting, traffic modelling and the assessment of the Scheme has been undertaken in full accordance with the Department of Transport's (DfT) Transport Analysis Guidance (TAG), utilising the most up to date modelling tools. Traffic modelling sensitivity tests using both high and low growth scenarios have also been undertaken, which have confirmed that the Scheme is forecast to deliver significant journey time savings and thus, user benefits, under both these scenarios. Therefore, there is a level of confidence in the forecast changes in traffic flows for both the Do-minimum and Do-something scenarios notwithstanding the inherent uncertainties with all forecasts.</p> <p>The affected road network (ARN) for the air quality assessment for the operational phase of the Scheme has been determined in accordance with DMRB LA 105 (paragraph 2.1).</p>

Question Number	Question	IP Response	National Highways Response
			<p>The A57 Snake Road, between Ellison Street (Glossop) and the A6013 is the only road that meets DMRB LA 105 traffic scoping criteria, that lies within 200 metres of a European Site. Changes in nitrogen deposition rates on habitats within South Pennine Moors SAC and Peak District Moors SPA adjacent to this section of the A57 were therefore undertaken as part of the air quality assessment.</p> <p>The changes in nitrogen deposition rates with the Scheme are less than the DMRB LA 105 designated habitat criterion of 0.4 kg N/ha/yr within the South Pennine Moors SAC which overlaps with the Peak District Moors SPA. The competent biodiversity expert considered the change in nitrogen deposition and concluded the Scheme was not expected to have a significant effect on the designated habitats within these sites.</p> <p>The largest change in nitrogen deposition rates at the closest point to the section of A57 under consideration, where the boundary of the South Pennine Moors SAC and Peak District Moors SPA is adjacent to the road is expected to be 0.21 kg N/ha/yr. The change in annual average daily traffic (AADT) on this section of the A57 would effectively need to double in order for the change in nitrogen deposition to exceed 0.4 kg N/ha/yr.</p> <p>The A628 does not meet the DMRB LA 105 traffic scoping criteria and has been screened out of assessment. The traffic change on the A628 between New Road and the A6024 with the Scheme is expected to be +950 AADT, however east of the A6024, where the European Sites boundary is adjacent to the road, the traffic change reduces to +850 AADT.</p> <p>Where the AADT change with the Scheme is +950, the boundary of the European Sites are approximately 50m from the road at the closest point and over 100m from the road for the majority of the A628 between New Road and junction with the B6015.</p>
12.12	<p>Habitats Regulation Assessment [APP-054]</p> <p>Screening matrices</p> <p>Please can the Applicant update the evidence notes to identify the specific location of the supporting information and supply word versions of the screening matrices.</p> <p>This should include the following updates:</p> <p>a) In Tables B.4 and B.5, cross reference to relevant documents and paragraphs within them that support the conclusion that there would not be construction related disturbance, degradation and reduction in species density impacts.</p> <p>b) In Table B.4, cross reference to relevant documents and paragraphs within them that support the</p>	<p>We have concerns that insufficient evidence is presented to support the conclusion that there would not be significant operational impacts on SPA SSSI-qualifying breeding bird species, and on Mountain Hare as a Species of Principal Importance in England, regarding noise and road mortality impacts; and that, for the reasons outlined in 7.14a) above, that potential air quality impacts have been wrongly screened out as having a likely significant effect. In addition, visual disturbance to species, and increased wildfire risk associated with increased traffic volumes, have not been considered.</p>	<p>Please see responses to paragraphs 8.6.2 and 8.6.3 within our response to PDNPA's Local Impact Report.</p>

Question Number	Question	IP Response	National Highways Response
	<p>conclusion about operational noise impacts to qualifying birds in the Peak District Moors (South Pennine Moors Phase 1) Special Protected Area (SPA).</p> <p>c) In Table B.4, cross reference to relevant documents and paragraphs within them that support the conclusion about mortality from vehicle collision during operation to qualifying birds in the Peak District Moors (South Pennine Moors Phase 1) SPA.</p> <p>In Table B.5, cross reference to the relevant paragraphs of ES Chapter 5 and the Transport Assessment Report and relevant appendices that support the conclusions regarding air quality impacts and features scoped out of the assessment.</p>		

9. REP2-055 Tameside Metropolitan Borough Council Response to the Examining Authority's First Written Questions (WQ1)

Question Number	Question	IP Response	National Highways Response
1.32	<p>a) Please identify where it would be helpful, for example to bring clarity or to help avoid any later misunderstandings, for specific provisions to be included in any Requirement for consultation or agreement to be required with relevant bodies.</p> <p>b) In each case, please explain why the provisions should be included.</p>	<p>Local Highway Authority</p> <p>a) No response at this time</p> <p>b) No response at this time</p> <p>Local Planning Authority</p> <p>As a general point, where consultation with the local planning authority is specified (for example requirements 3 and 4), there maybe a need to consult further. For example in requirement 4 regarding the EMP, consultation with the local planning authority is appropriate where a response would be reached in consultation with environmental health. However, there is no need for this to be explicit in our view.</p> <p>Requirement 5: landscaping. Consultees should also include Natural England, Environment Agency, and GMEU and the local planning authority. This is needed to give a comprehensive view of the proposed landscaping scheme and mitigation measures contained therein.</p> <p>Requirement 6: contaminated land. The Council's environmental health officer concerning contaminated land should also be consulted. As the Environment Agency has a specific remit regarding impact on the water environment, this would ensure that contaminated land matters are dealt with comprehensively.</p> <p>Requirement 8: drainage. Consultation should also be with the LLFA and United Utilities to ensure that there is a comprehensive review and agreement to the scheme with all relevant parties.</p> <p>Requirement 10: archaeology. There should be consultation with GMAAS to ensure that there is a technical review of the proposed investigation prior to implementation.</p>	<p>National Highways acknowledge that the local planning authority may need to consult their individual departments but agrees that this does not need to be specific.</p> <p>Requirement 5 - Natural England have confirmed in their response to the ExA first questions that aside from National Highways consulting Natural England for a License for the relevant European and protected species Licensing, Natural England would not expect to be consulted on other issues, unless further information comes forward that could lead to significant impact upon Internationally and Nationally Designated sites by any bodies.</p> <p>The Environment Agency have not requested to be consulted and, like Natural England, they have a particular remit.</p> <p>In relation to the Greater Manchester Ecology Unit we understand that the Unit provides advice to TMBC and the other ten district councils that make up Greater Manchester. The Unit is hosted by TMBC and it is open for TMBC to consult the GMEU but National Highways does not regard this as necessary given that landscaping is a local matter.</p> <p>Requirement 6 provides for the relevant planning authority to be consulted and, as above, we do not see the need to specify the particular department or departments.</p> <p>Requirement 8 In other National Highways/Highways England Development Consent Orders there is only reference to the relevant planning authority. There are separate protective provisions with the LLFA and United Utilities which ensure their remit is accounted for in any scheme that is submitted for approval.</p> <p>Requirement 10: As with Requirement 5, the Greater Manchester Archaeological Advisory Service (GMAAS) provides advice to TMBC and it is open to TMBC to consult the GMAAS. National Highways is content to consult the with the County Archaeologist.</p>

Question Number	Question	IP Response	National Highways Response						
1.41 and 1.42	<p>1.41</p> <p>Should there be a requirement for the relevant planning authority, local highway authority and/ or the Environment Agency to be consulted on written details of the surface and foul water drainage system?</p> <p>1.4.2</p> <p>a) Should any works otherwise in accordance with the flood risk assessment require the relevant lead local flood authority to be satisfied, as well as the Environment Agency?</p> <p>b) Are the Environment Agency and lead local flood authorities content that works do not need to be carried out in accordance with the flood risk assessment if all affected landowners accept the predicted exceedances of flood levels?</p>	<p>1.41</p> <p>Local Highway Authority</p> <p>TMBC acts as the LLFA and needs to be consulted on surface water proposals. Where any foul water drainage is proposed to be handed over to the LHA then consultation and agreement on this will be necessary.</p> <p>Local Planning Authority</p> <p>Yes. There will need to be consultation with the lead local flood authority and United Utilities also.</p> <p>1.42</p> <p>a) Yes, any works otherwise in accordance with the flood risk assessment should require the relevant lead local flood authority to be satisfied, as well as the Environment Agency.</p> <p>b) This depends on any potential knock on effects. Whilst local landowners may be happy, the LLFA would also need to be satisfied as to the potential consequences of any predicted exceedances of flood levels.</p>	<p>Please see our response above regarding Requirement 8.</p>						
1.43	<p>Should requirements be added for:</p> <p>a) any matters to be consulted and/ or agreed in writing with the Secretary of State or the County Archaeologist;</p> <p>b) any programme of archaeological reporting, post excavation and publication to be consulted on and/ or agreed in writing; and/ or for</p> <p>c) suitable resources and provisions for long term storage of any archaeological archives to be consulted on and/ or agreed in writing?</p>	<p>a) Yes, a scheme of investigation should be submitted to and agreed by the relevant LPA and GMAAS as appropriate.</p> <p>b) The above should include provision for reporting, mitigation and preservation of findings where appropriate.</p> <p>c) Preservation and storage of findings should be provided for again in consultation with appropriate bodies.</p>	<p>Please see our response above regarding Requirement 10.</p> <p>Otherwise as stated in the REAC, the proposed Archaeological Fieldwork Strategy would be issued alongside the EMP (Second iteration). The requirements for archaeological reporting, post excavation and publication will be set out in this document. More detailed requirements will be set out in the Written Scheme of Investigation identified at requirement 10(1). No specific reference to these matters is required in the DCO.</p>						
1.48	<p>Please could the local planning authorities and local highway authorities advise whether they:</p> <p>a) have reviewed the detailed contents of Parts 1-9 of Schedule 3 and provided their comments to the Applicant;</p> <p>b) are awaiting any responses from the Applicant and/ or is aware of any matters that have not been agreed with it;</p> <p>c) have any concerns about Parts 1-9 of Schedule 3?</p>	<p>Local Planning Authority</p> <p>This matter is not relevant to the local planning authority.</p> <p>Local Highway Authority</p> <p>a) Not that we are aware of</p> <p>b) Not that we are aware of</p> <p>c) See table below which refers to Schedule 3, Part 8, Public Rights of Way.</p> <table><tr><th colspan="3">Schedule 3 – Part 8 – Public Rights of Way</th></tr><tr><td></td><td></td><td></td></tr></table>	Schedule 3 – Part 8 – Public Rights of Way						<p>Items 1 and 18 included in the draft Order have been changed to “footway/cycleway with equestrian use” in the draft Order submitted at Deadline 3.</p> <p>The “footway/cycleway with equestrian use” will be provided with surfacing appropriate for equestrian use.</p> <p>The section shown on the Streets, Rights of Way and Access Plans (REP1-003) as being new or diverted footpath close to point 1/44 follows the existing public right of way and is not new. The plans will therefore be updated accordingly before the end of examination.</p>
Schedule 3 – Part 8 – Public Rights of Way									

Question Number	Question	IP Response			National Highways Response
		Reference from Schedule table	Detail of concern	Suggested action	
		Proposed Bridleway (Items 1 & 18)	This route was originally discussed to be a shared cycleway/footway. Equestrian access was requested to the side with a suitable surface. Now that the route is proposed as a bridleway, a suitable surface will be needed.	It might be more appropriate to propose a shared cycleway/footway but include equestrian use in the order. A bitmac surface could then be used with less chance of objection from equestrians.	
		General comment	There is a section of 'New or diverted footpath' shown close to point 1/44 on Sheet 1 of the Streets, Rights of Way and Access Plans. This is not included within the Part 8 table.	Include within the Part 8 table if needed.	
1.50	Please could the local planning authorities and local highway authorities Applicant advise whether they: a) have reviewed the detailed contents of Parts 1-3 of Schedule 4 and provided their comments to the Applicant; b) are awaiting any responses from the Applicant and/or is aware of any matters that have not been agreed with it; c) have any concerns about Parts 1-3 of Schedule 4?	Local Planning Authority This matter is not relevant to the local planning authority. Local Highway Authority a) Not that we are aware of b) Not that we are aware of c) See table below which refers to Schedule 4 – Part 1 – Public rights of way or highway to be stopped up and for which a substitute is to be provided.			Response to 'General comment' number 1 – whilst there are substitute public rights of way proposed, there are no substitute highways proposed Response to 'General comment' number 2 – National Highways has used the full public right of way references to assist in identification.

Question Number	Question	IP Response			National Highways Response
		Schedule 4 – Part 1 – Public rights of way or highway to be stopped up and for which a substitute is to be provided			Response to ‘General comment’ number 3 – both references are to the same project element. These will be updated in subsequent versions of relevant documents.
		Reference from Schedule Table	Detail of concern	Suggested action	Response to LON/90 number 1 - the extent of stopping up required is 60m in line with the extents shown on the Streets rights of way and access plans sheet 6.
		General comment	There has been no detail discussed over widths, construction details etc. for the substitute highway. No details are contained within the Schedule either.	Provision of a document or plan setting out these important factors to be considered as part of the proposed diversions.	Response to LON/90 number 2 - Implementing the stopping up of the remaining length of LON/90 from its junction with LON/91 to Tara Brook Farm would require a change to the DCO or to be implemented by other means. If it is not possible to implement this change through the DCO process, the Applicant will assist Tameside MBC to implement this change.
		General comment	The PRoWs have been referred to by means of an administrative code rather than the correct footpath reference as listed on the definitive map and statement.	The second set of digits to be removed from the PRoW reference in this and any other documentation ie. LON/90/100 to be LON/90 and LON/88/60 to become LON/88.	Response to LON/90 number 3 – Extending the ‘new or diverted footpath’ beyond point 6/3 to meet up with the current alignment of LON/90 would require a change to the DCO or to be implemented by other means. If it is not possible to implement this change through the DCO process, the Applicant will assist Tameside MBC to implement this change.
		General comment	There is use of two terms which at first glance appear to refer to the same provision which may cause confusion: “New combined footway/cycleway” and “ New non-segregated footway/cycle track”	Can clarification be given over the distinction between these two types of provision?	Response to LON/90 number 4 - The need to advertise the alternative Tameside Trail route will be discussed by the Applicant with Tameside MBC as part of the ongoing liaison.
		LON/90	The extent of stopping up is recorded as 200 metres; however, this	Re-calculate the extinguishment length.	Response to LON/52 - The description within the schedule will be updated to reflect what is shown on the Streets, rights of way and access in subsequent versions of relevant documents.

Question Number	Question	IP Response		National Highways Response
			does not appear to tie in with the extent as shown between points 6/4 and 6/5 on Sheet 6 of the Streets, Rights of Way and Access Plans.	Was the intention that the length of stopped up highway start within the grounds of Tara Brook Farm so that there is no cul-de sac path left remaining?
			As stated above, if the stopping up takes place as detailed on Sheet 6, there will be a length of path remaining that will form a cul-de-sac with little purpose to the public. This would leave an unwanted maintenance liability with the local highway authority.	It might be advantageous to stop up Footpath LON/90 from its junction with LON/91 at Tara Brook Farm.
			There is a length of 'Existing Public Right of Way' shown leading from point 6/3 on Sheet 6 of the Streets, Rights of Way and Access Plans in a northerly direction to meet Footpath LON/90 within the grounds of Tara Brook Farm. This short section of route is not recorded as a public right of way on the definitive map and statement and so would leave a gap in the network.	Extend the length of the 'New or diverted footpath' beyond point 6/3 to meet up the current alignment of Footpath LON/90. It is noted that this section appears to be outside of the land ownership edged in red and so permissions etc. may need to be sought from the current landowners.

Question Number	Question	IP Response		National Highways Response
			<p>Part of the Tameside Trail runs along footpath LON/90.</p> <p>Does this need to be advertised as affecting this promoted route?</p> <p>Consider whether this is a necessity or not.</p> <p>Might be for TMBC to realign without need for an order.</p>	
		LON/52	<p>The description of the substituted highway refers to the new footpath connecting from point 2/5 and back to point 2/4, however according to Sheet 2 of the Streets, Rights of Way and Access Plans, the section of footpath only extends to point 2/8.</p> <p>The route then continues as a bridleway to point 2/4.</p> <p>Consider altering the Schedule to reflect what is shown on the associated plan.</p>	
2.1	<p>ES paragraph 1.3.10 sets out the Applicant's list of relevant adopted plans.</p> <p>a) Does this constitute the full list of development plans and policies relevant to the Proposed Development? Please explain their relevance.</p> <p>b) Are there are emerging development plans? If so, please supply copies there any emerging development plans? If so, at what stage are these proposed plans?,</p> <p>c) If there are emerging development plans, are there any policies in them which may be relevant? If so, please supply copies.</p> <p>d) Are there any non-statutory local policies which may be relevant? If so, please supply copies.</p>	<p>a) Not able to confirm at this stage</p> <p>d) Other relevant policies include:</p> <ul style="list-style-type: none"> Greater Manchester Transport Strategy 2040 (updated 2021)(GMCA/TfGM) Our Five Year Transport Delivery Plan 2021-2026 – Part of the Greater Manchester Transport Strategy 2040 (published 2021) (GMCA/TfGM) Streets for All – Part of the Greater Manchester Transport Strategy 2040 (published 2021) (GMCA/TfGM) [REDACTED] Bus Service Improvement Plan (October 2021) (GMCA/TfGM) [REDACTED] [REDACTED] Greater Manchester Clean Air Plan (approved 2021) 		

Question Number	Question	IP Response	National Highways Response
		<p>(GMCA/TfGM)</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <ul style="list-style-type: none">Climate Change and Environmental Strategy (published 2021) (Tameside MBC) <p>Local Planning Authority</p> <p>a) GM Joint Waste DPD</p> <p>b) Yes – Publication Stage Places for Everyone Joint Development Plan Document (PfE)</p> <p>c) PfE Policies</p> <p>i. Policy JP-Strat 6 Northern Areas;</p> <p>ii. Policy JP-Strat 13 Strategic Green Infrastructure;</p> <p>iii. Policy JP-Strat 14 A Sustainable and Integrated Transport Network;</p> <p>iv. Policy JP-S 1 Sustainable Development;</p> <p>v. Policy JP-S 5 Flood Risk and the Water Environment;</p> <p>vi. Policy JP-S 6 Clean Air;</p> <p>vii. Policy JP-S 7 Resource Efficiency;</p> <p>viii. Policy JP-J 1 Supporting Long-Term Economic Growth;</p> <p>ix. JP-G 1 Valuing Important Landscapes;</p> <p>x. JP-G 2 Green Infrastructure Network;</p> <p>xi. JP-G 3 River Valleys and Waterways;</p> <p>xii. JP-G 5 Uplands;</p> <p>xiii. JP-G 7 Trees and Woodland;</p> <p>xiv. JP-G 9 A Net Enhancement of Biodiversity and Geodiversity;</p> <p>xv. JP-G 10 The Green Belt;</p> <p>xvi. JP-P 1 Sustainable Places;</p> <p>xvii. JP-P 2 Heritage;</p> <p>xviii. JP-P 6 Health;</p> <p>xix. JP-C 1 An Integrated Network;</p> <p>xx. JP-C 3 Public Transport;</p> <p>xxi. JP-C 4 Streets for All,</p> <p>xxii. JP-C 5 Walking and Cycling;</p>	<p>The Applicant's position on the status and weight to be given to <i>Places for Everyone</i> is set out in the Case for the Scheme and also in our response to Tameside MBC's Local Impact Report.</p>

Question Number	Question	IP Response	National Highways Response
		<p>xxiii. JP-C 6 Freight and Logistics;</p> <p>xiv. Policy JP Allocation 31 Godley Green Garden Village;</p> <p>xxv. Policy JP Allocation 32 South of Hyde;</p> <p>xvi. JP-D 1 Infrastructure Implementation; and</p> <p>xvii. Appendix B – Additions to the Green Belt: policy Green Belt Addition 37, 40 and 41.</p> <p>d) Yes</p>	
3.15	<p>The intention is stated to restrict use of the main carriageway of the scheme by walkers, cyclists, and horse riders.</p> <p>e) Do the local authorities and local highway authorities have any comments on the adequacy of this level of provision to cater for cycling demand on the local network and the support it provides for alternative modes of transport to the private car?</p>	<p>e) There is ongoing discussion with applicant's design team with regards to pedestrian, cycling and equestrian provisions. In general, the scheme provides additional links or improved routes to the benefit of cyclists. One movement which does not yet appear to be well catered for is cyclist (including pedestrian and equestrian) movement from the west and then northwards (i.e. up to Roe Cross Road)</p>	<p>The scheme proposes to provide improved cycling provision from the west (J4) to the centre of Mottram via the detrunked A57 Hyde Road. There are currently no proposals within the scheme to improve the pedestrian, cyclist or equestrian provision from Hyde Road to Roe Cross Road. However, discussions have been held between the applicant and TMBC regarding a potential connection between the proposed Bridleway (LON46) and Edge Lane which could be delivered separately through designated funds.</p>
3.18	<p>These documents provide conflicting information in regard to minimum overhead clearances.</p> <p>b) Is the proposed overhead clearance to the Public Right of Way appropriate?</p>	<p>b) CD 353 states that 2.3m is the minimum headroom clearance for pedestrians. On this basis and due to the length of the underbridge, 2.5m minimum clearance would be preferable to make passage more comfortable and to allow for improved natural light.</p>	<p>This increase in headroom to a minimum of 2.5m will be accommodated within the detailed design of the footpath.</p>
3.28	<p>a) Please could the Applicant summarise how travel patterns have been modelled during construction? b) What feedback from local authorities and local highway authorities has been incorporated? c) Please could the local authorities and local highway authorities comment?</p>	<p>c) Sections 3.28 – 3.36. To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.</p>	<p>Initial discussions on traffic management have been undertaken with the local highway authorities. As the detailed design progresses, we will discuss construction and traffic management further with the local highway authorities.</p>
3.29	<p>It is stated that operations of limited durations might take place outside of the core working hours, as defined in the dDCO due to safety requirements.</p> <p>b) Please could the local authorities and local highway authorities comment?</p>	<p>b) To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.</p>	<p>Please see National Highways' response to paragraph 3.28.</p>
3.30	<p>It is stated that the A57 Trunk Road may, during the works, be used as a diversion route during other operations.</p> <p>b) Please could the local authorities and local highway authorities comment?</p>	<p>b) To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.</p>	<p>Please see National Highways' response to paragraph 3.28.</p>
3.31	<p>a) How will the needs of vulnerable users traversing the works be assessed?</p> <p>b) Please could the local authorities and local highway authorities comment?</p>	<p>b) To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.</p>	<p>Please see National Highways' response to paragraph 3.28.</p>

Question Number	Question	IP Response	National Highways Response
3.32	a) Is any review process proposed to assess the effectiveness and safety of traffic management measures during the construction phase? b) If so, what arrangements will be put in place to amend traffic management? c) Please could the local authorities and local highway authorities comment?	b) To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.	Please see National Highways' response to paragraph 3.28.
3.33	Clarification is needed regarding the expected number of daily Heavy Duty Vehicle movements during construction. ES Appendix 11.2 includes construction vehicle movement, but movements are described as total movements over a period of construction rather than daily numbers, which is the basis of screening out using Design Manual for Roads and Bridges (DMRB) criteria. Please could the Applicant provide information about the expected number of daily Heavy Duty Vehicle movements during the construction period?	b) To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.	Please see National Highways' response to paragraph 3.28.
3.34	a) Has any assessment been made of the impact of the proposed Outline Traffic Management Plan on bus services? b) Please could the local authorities and local highway authorities comment?	b) To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.	Please see National Highways' response to paragraph 3.28.
3.35	Have the local authorities or local highway authorities any comments on: a) the practicability of the Outline Traffic Management Plan; b) measures that should be included in the Detailed Traffic Management Plan; c) the timing of the issue of the Detailed Traffic Management Plan; or d) the need for the Detailed Traffic Management Plan to be consulted on and/ or agreed with them?	To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038. d) It is important for the Detailed Traffic Management Plan to be consulted on and/ or agreed with them.	Please see National Highways' response to paragraph 3.28. DCO requirement 4 secures consultation on the Traffic Management Plan with local highway authorities.
3.36	Do the local authorities have any more comments regarding the Applicant's assessment of construction traffic and temporary closures and diversions, including: a) the nature of likely effects on receptors; b) relevant mitigation measures secured by the dDCO, Outline Traffic Management Plan, and Outline EMP; c) whether any potential to worsen accessibility would be mitigated so far as reasonably possible; d) the sufficiency of consideration given to mitigation by way of the design, lay-out or construction methods for the Proposed Development; e) whether the mitigation measures are proportionate, reasonable and focussed on promoting sustainable development; f) whether the mitigation measures are enforceable, precise, sufficiently secured and likely to result in the identified residual impacts; g) the identification of all significant impacts; and h) road safety during construction?	To date no formal discussions have taken place with the LHA concerning the outline Traffic Management Plan. The LHA has not had time to consider the proposals of REP1-038.	Please see National Highways' response to paragraph 3.28.

Question Number	Question	IP Response	National Highways Response
4.1	<p>Section 7.5 of the Case for the Scheme sets out the Applicants position regarding Green Belt policy implications of the Proposed Development.</p> <p>c) Tameside Metropolitan Borough Council's comments are requested on the Applicant's Green Belt assessment. Where there are areas of disagreement, please explain why.</p>	<p>Para 7.5.18 should reference that harm needs to be 'clearly' outweighed and it is queried whether the applicant needs to reflect on the Greater Manchester GB Assessment prepared by LUC in support of Places for Everyone.</p>	<p>We have reviewed the Greater Manchester Green Belt Assessment (LUC, July 2016) and note its findings with regard to the parcels of Green Belt land which the Scheme passes through. As set out in the Case for the Scheme, the Applicant considers the Scheme does not constitute inappropriate development within the Green Belt.</p> <p>Section .5 of the Case for the Scheme (REP2-016) sets out how the Scheme does not compromise any of the five purposes of the Green Belt set out in paragraph 138 of the NPPF.</p>
5.4	<p>Paragraph 7.3.66 sets out viewpoints used to aid the assessment of night-time effects arising from operational lighting.</p> <p>Are the local authorities and Peak District National Park Authority content that the chosen viewpoints are representative?</p>	<p>The six viewpoints selected for the night-time assessment are in close proximity to the scheme's alignment and do not take account of views from other sensitive receptors, including the Mottram Conservation Area around Warhill, Werneth Low and Hobson Moor.</p>	<p>In line with the assessment criteria in DMRB LA 107, a high-level night-time assessment was undertaken for relevant landscape and visual receptors which might be likely to be affected by the addition of artificial lighting from lighting columns and vehicle lighting along the route of Scheme. Viewpoints were selected to obtain the most unobstructed night views of the Scheme. Viewpoints were selected to be representative of views and landscape effects along the route at intervals that were mostly likely to be affected by change to the night view. The viewpoints are considered to best demonstrate the night-time effects through previously unlit areas along the whole of the Scheme route. Other viewpoints have not been considered as part of the assessment as a result of being unsafe to access during hours of darkness, being in close proximity to existing lighting, or as unlikely to have visual receptors after dark. For the night-time lighting assessment, where access was not possible or not considered to be safe in the dark, an assumption was made regarding what the anticipated change might be. Viewpoints where there is unlikely to be visual receptors after dark have not been considered further.</p> <p>With regard to the Mottram Conservation Area, Werneth Low is outside the 2km study area for visual assessment. The area at Warhill is represented by a number of other viewpoints including VP8, and Viewpoint V-T-04-2 and Viewpoint V-R-33 as represented on Figure 7.8 Visual Effects Drawing Sheet 1. VP8 was assessed for night-time views as well as daytime views. The Zone of Theoretical Visibility (ZTV) indicated potential views of the Scheme from Hobson Moor however as a result of topography, intervening vegetation and built form, views of the Scheme are limited from this distance.</p>
5.7	<p>a) Are the local authorities, Peak District National Park Authority and Natural England satisfied with the approach for landscape and visual with respect to:</p> <ul style="list-style-type: none"> the study area and visibility; the receptors selected for the assessment and whether they are representative; 	<p>a)</p> <p><u>Study Area and Visibility</u></p> <p>The landscape assessment study area uses a 1km offset from the Draft Order Limits, this is appropriate. However, the description of the area as 'dense urban' in para 7.5.2 is not an accurate representation of the areas characteristics.</p>	<p>Study Area and Visibility</p> <p>With regards to the description of 'dense urban' in para 7.5.2, is the ES states that the main components of the Scheme coincide with the dense urban areas:</p> <p><i>"This distance is considered adequate given the corridor nature of the Scheme; and that the main components of the Scheme with</i></p>

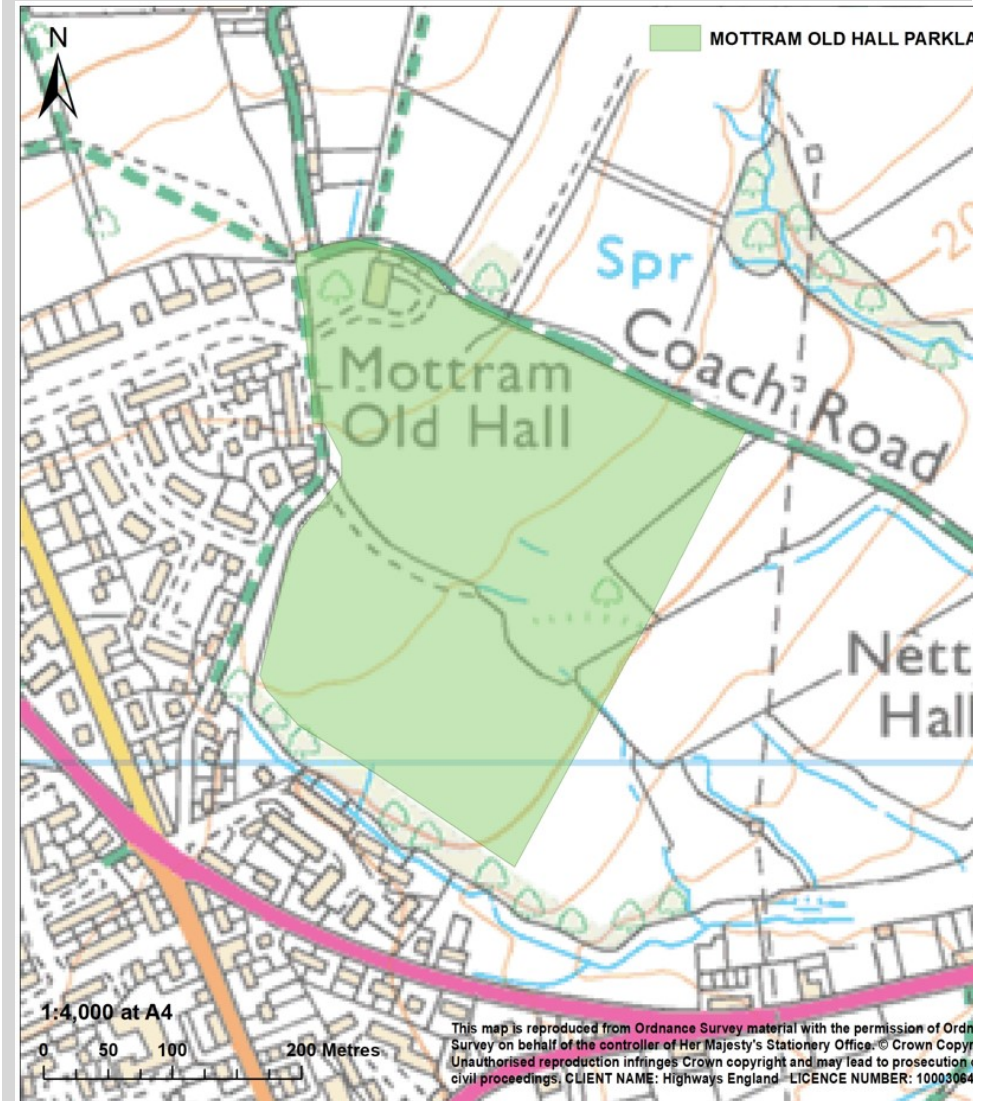
Question Number	Question	IP Response	National Highways Response
	<ul style="list-style-type: none"> the definitions of value, significance, sensitivity and magnitude of impact; and the criteria used to define significant effect? <p>How should any outstanding concerns be addressed?</p>	<p>The visual assessment study area uses a 2km offset and this omits some potentially key theoretical viewing points.</p> <p><u>Receptors selected for the assessment</u></p> <p>Observation with regards to the receptors selected:</p> <ul style="list-style-type: none"> Additional receptors could be included as highlighted at question 5.4 at Mottram Conservation Area around Warhill (although VP8 is only approx. 250 metres from this location, it does not allow a view of the land that forms part of the setting for Mottram Conservation Area), Werneth Low and Hobson Moor which are not included in Table 7.24: Viewpoints (Direct and Indirect), etc <p><u>The definitions of value, significance, etc.</u></p> <p>No comment</p> <p><u>Additional information</u></p> <p>Reference could be made to the LUC Landscape Character and Sensitivity Assessment (part of the evidence base for Places for Everyone Joint DPD) as this is not identified at para 7.6.32 of the Landscape and Visual Effects document.</p> <p>The area covered by Figure 7.2 Local Landscape Character falls under three typologies identified in the LUC landscape Character and Sensitivity Assessment:</p> <ul style="list-style-type: none"> LCT Pennine Foothills (Dark Peak) – 33 Matley and Mottram; and LCT Open Moorlands and Enclosed Upland Fringes (Dark Peak) – 32 White Gate to Mottram. LCT Incised Urban Fringe Valleys – 34 River Etherow. <p>When reviewed against Figure 7.2 Local Landscape Character map (figure 7.2) the typologies are not dissimilar, though the geographical areas for the typologies do differ and it would be helpful if the applicant could explain this difference.</p> <p>The LUC landscape Character and Sensitivity Assessment refers to guidance and opportunities for future development and landscape management / enhancement and ES Chapter 7 should consider this.</p>	<p><i>the potential to cause landscape an adverse effect (such as the embankments and bridges) also coincide with the existing highway corridors of the A57 or dense urban areas along the existing route. “</i></p> <p>The visual study area is informed by the ZTV which extended to 10km from the Scheme and a more focused 2km offset from the Scheme (refer to Figure 7.7 of the ES (APP-096). In this way a comprehensive set of key viewpoints were identified but , importantly, these were then tested for actual likely visibility following field work.</p> <p><u>Receptors selected for the assessment</u></p> <p>Please refer to response to question 5.4.</p> <p><u>Additional information</u></p> <p>The typologies are not dissimilar. A comparison has not been undertaken between the published LCAs listed in para 7.6.32 of ES Chapter 7: Landscape and Visual Effects (REP2-007) and the LUC Landscape Character and Sensitivity Assessment.</p> <p>Guidance for design development for the Scheme has been undertaken. All elements will, however, be further developed at the Detailed Design stage and will seek to follow the good design principles outlined in the Design Principles for National Infrastructure and National Design Guide documents (which are primarily to aid the decision-making process) by responding to setting, place and people. The current design aligns with the guidance in a number of ways, through the integration of locally appropriate habitats and water features, including sustainable drainage provision; by creating networks of green spaces and encouraging walking and cycling through a more connected local environment, by promoting safety and security with safe legible and well-lit wayfinding and in responding to local place, character and identity by incorporating natural features which reflect the local context, including landforms, woodlands, scrublands, grasslands and hedgerows which will seek to follow local species and patterns. The design will also reflect local receptors in protecting sensitive views and respecting the local landscape character wherever possible.</p> <p>The following design principles cover the Applicant’s general approach and although this section is focussed on the landscape and visual considerations, these principles have not been developed in isolation, as they take in a much wider brief embracing other key issues such as sustainability, buildability and inclusivity. The engineering solutions / details for each of the structures remain in development and are not currently available but they will take these principles into consideration. Material choices are also currently under review but all bridges and</p>

Question Number	Question	IP Response	National Highways Response
			<p>structures will seek to deliver sustainable, low carbon infrastructure elements which are attractive, easy to build and maintain and appear as a family of structures.</p> <p>An Outline Landscape and Ecology Management Plan (LEMP) has also been produced and is submitted into the examination at Deadline 3. This document describes the proposed management and monitoring of the landscape and ecological mitigation and compensation features of the Scheme.</p>
5.15	<p>a) Do the local authorities, Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> the landscape and townscape impact assessment; mitigation measures including the REAC and Environmental Masterplan; whether a draft Landscape and Ecological Management Plan should be submitted to the Examination; the maintenance regime, monitoring and remedial actions during operation; or compliance with policy? <p>b) Are there any reasons to question that there would be no significant effects on landscape or townscape character, other than the temporary effects identified in ES Chapter 16?</p> <p>How should any outstanding concerns be addressed?</p>	<p>a)</p> <p>Has the Greater Manchester Urban Historic Landscape Characterisation Project (GMUHLC), completed in 2012, been used to inform both the LCA and TCA assessments? This is publically available on (under Culture and Heritage).</p> <p><u>Landscape</u></p> <ul style="list-style-type: none"> SLLCA 3: Dry stone walls and extensive equine activity are not mentioned in the description, they are both significant characteristics of the area. <p><u>Townscape</u></p> <ul style="list-style-type: none"> SLTCA 5: The wording should reflect the ribbon development along the former turnpike road. This area includes residential properties dating between the 17th and 19th centuries, including converted farm buildings and weavers cottages (See GMUHLC). The area is almost wholly residential in nature and should be regarded as of medium value character, susceptibility to change and sensitivity. Also – inconsistent wording: local value vs low value in para 1 under ‘Value and Susceptibility’ column? SLTCA 7: There is little recognition of the historic development of Hollingworth extending out from the village core (SLTCA 6) in a linear form along Market Street and Woolley Lane. <p><u>Mitigation Measures</u></p> <p>There appear to be limited mitigation measures included apart from planting of trees and shrubs etc. There is potential for identification and inclusion of boundary treatments that contribute to the landscape setting (particularly in SLLCA3). The applicant should explain why the proposed boundary treatments have been selected and a draft Landscape and Ecological Management Plan be submitted.</p> <p><u>Submission of draft Landscape and Ecological Management Plan</u></p> <p>A Landscape and Ecological Management Plan should be</p>	<p>a) The Greater Manchester Urban Historic Landscape Characterisation Project (GMUHLC), 2012 did not form part of the LCA and TCA assessments. The use of the GMUHLC information was not raised during the extensive consultation process. It is noted the GMUHLC document focuses particularly on ‘archaeologist’s understanding of the historical and cultural origins and development of the current landscape’. Therefore, whilst forming useful background heritage information the LCA and TCA assessments, used, were based on the following landscape specific assessments:</p> <ul style="list-style-type: none"> Peak District National Park Authority) Landscape Strategy and Action Plan (2009) Derbyshire County Council’s, The Landscape Character of Derbyshire (2014), and High Peak Borough Council’s High Peak Landscape Character Supplementary Planning Document (2006) <p>Landscape - SLLCA 3: the omission of ‘dry-stone walls and extensive equine activity’ from the description does not materially change the overall assessment of the character of the area (recognised as pastoral), as overall it is at ‘an intricate scale with some distinct local features, a sense of place and few detracting features’</p> <p>Townscape – Whilst it is understood that there may be interesting historical development during the 17th and 19th centuries, the assessment considers ‘The character area has few distinctive features or elements, the townscape area is generally common mixed urban development (predominately residential in nature)’</p> <p>With regard to the apparent inconsistent wording, reference should be made to the methodology used set out in Table 7.11: Landscape Sensitivity and Typical Descriptions.</p> <p>b) The Scheme Level Landscape Character Areas (SLLCAs) and Scheme Level Townscape Character Areas (SLTCAs) have been identified as part of the EIA process. At Scheme level the landscape character was assessed through undertaking a combination of driving and walking on selected routes within the</p>

Question Number	Question	IP Response	National Highways Response
		<p>provided in order to assess the impact.</p> <p><u>The maintenance regime, monitoring and remedial actions during operation</u> A draft Landscape and Ecological Management Plan should be provided in order to assess the maintenance regime, monitoring and remedial actions during operation as set out under the REAC – LV3.1.</p> <p><u>Compliance with policy?</u> In principle there are no policy issues, however a draft Landscape and Ecological Management Plan should be provided in order to assess this in further detail.</p> <p>b) The scale and nature of the scheme has the potential to give rise to significant effects on landscape and townscape character in the longer term.</p> <p>c) A Landscape and Ecological Management Plan should be provided in order to assess the impact further.</p>	<p>study area.</p> <p><u>Mitigation Measures</u> Mitigation is extensive beyond the planting of trees and shrubs as demonstrated in Figure 2.4 of the Environmental Masterplan (APP-074). Sheet 1 of the Environmental Masterplan sets out the environmental functions of each of the mitigation elements and these are indicated on each subsequent sheet.</p> <p>The scale and nature of the scheme is recognised, and an assessment has been carried out to reflect that. Effects have been assessed for both the winter year of opening (when all the mitigation elements would be in place, but the mitigation planting is not yet fully effective) and the summer of year 15 (when mitigation planting has become established and contributes to the landscape and visual resource). Refer to Chapter 7 of the ES, and in particular the Summary (Section 7.12)</p> <p>c) A Landscape and Ecology Management Plan (LEMP) has been produced as noted in the response to 5.7 above.</p>
5.19	<p>a) Do the local authorities or Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> the visual impact assessment; mitigation measures including the REAC and Environmental Masterplan; whether a draft Landscape and Ecological Management Plan should be submitted to the Examination; the maintenance regime, monitoring and remedial actions during operation; or compliance with policy? <p>b) Are there any reasons to question that there would be any significant visual effects other than those summarised in ES Chapter 16? How should any outstanding concerns be addressed?</p>	<p>a) <u>Visual impact assessment</u> The visual assessment study area uses a 2km offset and this omits some key theoretical viewing points.</p> <p><u>Mitigation measures</u> There appear to be limited mitigation measures included apart from planting of trees and shrubs etc. There is potential for identification and inclusion of boundary treatments that contribute to the landscape setting and visual impact (particularly in SLLCA3). The applicant should explain why the proposed boundary treatments have been selected and a draft Landscape and Ecological Management Plan be submitted.</p> <p><u>Submission of draft Landscape and Ecological Management Plan</u> A draft Landscape and Ecological Management Plan should be provided in order to assess the impact.</p> <p><u>The maintenance regime, monitoring and remedial actions during operation</u> A draft Landscape and Ecological Management Plan should be provided in order to assess the maintenance regime, monitoring and remedial actions during operation as set out under the</p>	<p><u>Visual impact assessment</u> The visual study area is informed by the ZTV but also by actual likely visibility following field work. It is considered that receptors beyond the 2km visual study area would not be likely to be significantly affected.</p> <p><u>Mitigation Measures</u> Mitigation is extensive beyond the planting of trees and shrubs as demonstrated in Figure 2.4 Environmental Masterplan. Sheet 1 of the Environmental Masterplan sets out the environmental functions of each of the mitigation elements and these are indicated on each subsequent sheet.</p> <p>b) The scale and nature of the scheme is acknowledged and an assessment has been carried out to reflect that. Effects have been assessed for both winter year one of opening (when all the mitigation elements would be in place, but the mitigation planting is not yet fully effective) and the summer of year 15 (when mitigation planting has become established and contributes to the landscape and visual resource). Refer to ES Chapter 7 Landscape and visual effects (REP2-007) and in particular the Summary (Section 7.12)</p>

Question Number	Question	IP Response	National Highways Response
		<p>REAC – LV3.1.</p> <p><u>Compliance with policy?</u></p> <p>In principle there are no policy issues, however a draft Landscape and Ecological Management Plan should be provided in order to assess this in further detail.</p> <p>b)</p> <p>The scale and nature of the scheme has the potential to give rise to significant visual effects in the longer term.</p> <p>c)</p> <p>A Landscape and Ecological Management Plan should be provided in order to assess the impact further.</p>	<p>c) An outline Landscape and Ecology Management Plan (LEMP) has been produced as noted in the response to 5.7 above.</p>
5.21	<p>a) Are the measures set out in Section 7.8 of ES Chapter 7 sufficient to mitigate any adverse effects from the Proposed Development and enable the projects to satisfy the requirements of the NPSNN, the NPPF and local policies for visual amenity and landscape?</p> <p>Should any further measures be required?</p>	<p>Local Highway Authority</p> <p>a) Discussions are underway with the applicant's design team with regards to the details of these measures eg – lighting, landscaping etc.</p> <p>b) The details of the proposal are now being discussed with the applicant's design team and will continue.</p> <p>Local Planning Authority</p> <p>A series of generic measures are set out where 7.8.6 states that the landscape design will be forthcoming at a later stage and 7.8.7 explicitly states that there are no enhancement measures have been identified.</p>	<p>Guidance for design development for the Scheme has been undertaken. All elements will, however, be further developed at the Detailed Design stage and will seek to follow the good design principles outlined in the Design Principles for National Infrastructure and National Design Guide documents (which are primarily to aid the decision-making process) by responding to setting, place and people. The current design aligns with the guidance in a number of ways, through the integration of locally appropriate habitats and water features, including sustainable drainage provision; by creating networks of green spaces and encouraging walking and cycling through a more connected local environment, by promoting safety and security with safe legible and well-lit wayfinding and in responding to local place, character and identity by incorporating natural features which reflect the local context, including landforms, woodlands, scrublands, grasslands and hedgerows which will seek to follow local species and patterns. The design will also reflect local receptors in protecting sensitive views and respecting the local landscape character wherever possible.</p> <p>The following design principles cover the Applicant's general approach and although this section is focussed on the landscape and visual considerations, these principles have not been developed in isolation, as they take in a much wider brief embracing other key issues such as sustainability, buildability and inclusivity. The engineering solutions / details for each of the structures remain in development and are not currently available but they will take these principles into consideration. Material choices are also currently in review but all bridges and structures will seek to deliver sustainable, low carbon infrastructure elements which are attractive, easy to build and maintain and appear as a family of structures.</p> <p>Details of Scheme finishes; street furniture and hard landscaping proposals will be confirmed through the Detailed Design process.</p>

Question Number	Question	IP Response	National Highways Response
			<p>The Detailed Design stage is currently expected to be completed in February 2023 prior to the start of works for the Scheme.</p> <p>For those aspects of the Scheme which will be adopted by the local authorities and local highway authorities the finishes and street furniture, etc. will be agreed in consultation with the relevant authority as outlined below.</p> <p>The proposed finishes and street furniture will be agreed with the relevant local highway authorities (Tameside MBC and Derbyshire County Council) through the approval process required by Article 12 of the DCO (REP1-041) which will cover the Scheme details.</p> <p>A significant amount of consultation with the local authorities has already been undertaken to inform and update on design progress. These links are well established and will be maintained throughout the consent process to ensure agreement and approvals are gained.</p>
5.22	<p>As above, the delivery of good design is an aspiration of the NPSNN and government.</p> <p>a) At what stage will details of finishes to the scheme, street furniture and other hard landscaping be provided?</p> <p>b) Should the proposed finishes and street furniture, etc. be agreed with the local authorities and local highway authorities?</p> <p>How would such agreement be reached?</p>	<p>Local Highway Authority</p> <p>a) Discussions are underway with the applicant's design team with regards to the details of these.</p> <p>b) Yes, the proposed finishes and street furniture, etc. should be agreed with the local authorities and local highway authorities.</p> <p>Local Planning Authority</p> <p>a) This question should be directed to the applicant only.</p> <p>b) Yes.</p> <p>Either through a requirement of the development consent or via compliance with existing standard e.g. DMRB.</p>	
6.4	<p>When referring to designated heritage assets, the NPPF only identifies two levels of harm, substantial and less than substantial. Table 6.3, which sets out the factors in assessing the magnitude of impact, also identifies limited harm.</p> <p>a) Applicant - Please set out whether limited harm should be qualified as less than substantial in terms of the NPPF tests? If not, please explain how limited harm should be considered against paragraph 199 of the NPPF which states that great weight should be given to an asset's conservation irrespective of whether any potential harm amounts to substantial, total loss or less than substantial harm to its significance.</p> <p>b) Historic England, Derbyshire County Council, High</p>	<p>b) The use of limited harm does not reflect the approach set out in NPPF para 199 and therefore the council would wish to consider the response from the applicant before commenting further.</p>	<p>Our response can be found at 6.4 within the "Applicant's response to Examining Authority's First Written Questions" (REP2-021).</p>

Question Number	Question	IP Response	National Highways Response
	Peak Borough Council and Tameside Metropolitan Borough Council – Do you have any comments on the use of limited harm given the tests sets out in the NPPF?		
6.7	The excavation of the Mottram Underpass cutting would result in the partial truncation of the former grounds of Mottram Old Hall. Do you consider that the parkland contributes to the significance of this designated heritage asset?	Given the location and nature of the site, it is unlikely that the parkland contributes significantly to the significance of Mottram Old Hall. And in that instance the proposal would have less than substantial harm. However clarification is sought if the reference to 'former grounds' and 'parkland' cover the same area and extent shown on a plan.	<p>The former grounds referred to in paragraph 6.7.20 of the Cultural Heritage chapter (REP1-015) refers to the former parkland associated with Mottram Old Hall.</p> <p>The map below shows the approximate extent of the grounds associated with Mottram Old Hall, as depicted on Bryant's 1831 map of Cheshire, which has informed the assessment presented in the Cultural Heritage chapter (REP1-015).</p> 
7.8	ES Chapter 5 [APP-061] and ES Appendix 4.1 [APP-152] do not explain whether the scoping out of a quantitative assessment of emissions from construction	No discussion has taken place, however the assessment has been carried out in line with DMRB LA105 the authority has no concerns if clarification is given regarding how considering the	Please see response 7.7 in the “Applicant's response to Examining Authority's First Written Questions” (REP2-021).

Question Number	Question	IP Response	National Highways Response
	<p>phase traffic has been discussed with relevant local authority environmental health officers, as requested in the Scoping Opinion [APP-152].</p> <p>Do the local authorities have any concerns about the scoping out of a quantitative assessment of emissions from construction phase traffic?</p>	<p>construction programme as five separate phases, rather than an overall construction period of more than two years complies with DMRB LA105.</p>	
8.1	<p>Section 14.2 of ES Chapter 14 [REP1-019] sets out relevant international, national, and local policies, the UK's carbon reduction targets and carbon budgets, and the Applicant's commentary on the requirements and implications for the Proposed Development.</p> <p>a) Are there any other key matters that should be added to the Applicant's commentaries on the legislation and policies?</p> <p>b) Is there any other important or relevant legislation or policy that the ExA should consider?</p> <p>c) Are there any other carbon reduction targets or carbon budgets that are relevant to the Proposed Development and for which there is a clear legal or policy basis for them to be considered?</p> <p>d) Should any UK case law/ court judgements be identified?</p> <p>e) Do National Highways have any carbon reduction targets that have not been published and/ or that it intends to apply on the Proposed Development?</p> <p>When responding please, where possible, explain why your comments relevant to the Proposed Development and to the ExA's consideration of it.</p>	<p>a) Referencing the Road Investment Strategy (RIS2) for the 2020-25 period... a contribution to wider climate change strategy and "ambitions" to decarbonise road transport. Specifically the ending of the sale of new ICE cars and vans by 2030. Hence the additional road infrastructure must contribute to the alleviation of pollution through road transport to compensate for that period where ICE are still on sale (and they will certainly be in general circulation well beyond that date). In reality, due to additional road capacity, GHG and PM's may likely increase in that locality up to and beyond that 2030 deadline.</p> <p>b) There is a GM regional effort to reduce GHG in line with the Tyndall curve – specified in the GM 5 Year Environment Plan and this is communicated locally through the aforementioned Climate Change & Environment Strategy.</p> <p>c) Tameside published its Climate Change & Environment Strategy 2021-2026 in December 2021. Travel & Transport forms one of the five key action oriented work-flows where the Borough will focus efforts to enable carbon neutrality as targeted (by 2038).</p> <p>No</p>	<p>a) The RIS2 2020-2025 document, references a date of 2040 for the end of the sale of new conventional petrol and diesel cars and vans, as it was published prior to the commitment by the Government to end the sale of new petrol and diesel cars and vans by 2030, and that all new cars and vans will be required to be fully zero emission at the tailpipe by 2035. The RIS2 2020-2025 document also did not take account of the Transport Decarbonisation Plan (TDP) published in July 2021, with the plan to ban sales of new diesel HGVs from 2040.</p> <p>National Highways has responded on the implications of bringing forward the ambitions of decarbonisation of the road network. Please refer to the response question 8.13 the National Highways response to Examining Authorities First Written Questions (REP2-021) for consideration of operational carbon emission rates beyond 2030.</p> <p>Please also refer to the response question 7.13 the National Highways response to Examining Authorities First Written Questions (REP2-021) for consideration of future year operational oxides of nitrogen (NOx) emissions relative to projected growth in traffic for England and Wales.</p> <p>b) Emissions are considered in the context of national carbon budgets, in line with guidance in DMRB LA 114 and the NPS NN. It is by the delivery of emission reductions in line with the national budgets, mandated by the Climate Change Act, that the UK Government seeks to meet its obligations as a Paris Agreement signatory, although some local authorities – such as GMCA – have taken the next step and set themselves ambitious local budgets to play their part in achieving these reductions. Chapter 14 of the ES considers local and regional ambitions to reduce GHG emissions as part of its review of relevant local and regional policy. However, it is not a requirement to base an assessment of significance on these; the Climate Change Act does not include a statutory duty for local authorities to set budgets or deliver these reductions.</p> <p>This Strategy was omitted from the documents cited in Table 14.1 of Chapter 14 of the ES, however it is noted that it is aligned with</p>

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			the GMCA 5 Year Environment Plan. As with the response to (b) there is no legal requirement to assess local authority budgets.
8.11	<p>Item C1.8 of the REAC [REP1-037] states that: <i>“A comprehensive Carbon Management Plan would be implemented from the Detailed Design stage and through construction. This would follow a data collection and analysis methodology which adheres to the requirements of the PAS 2080. This would assess carbon use for the whole lifecycle of the project and promote embodied carbon management and commit to achieving carbon reductions.”</i></p> <p>The ExA wishes to ensure that the mitigation measures are enforceable and precise and will result in mitigation being delivered.</p> <p>a) Please could more detail be provided on the Carbon Management Plan and how it would be enforced? b) How can the precision be improved to clarify that carbon emissions would be reduced? c) To be precise, should the reduction be quantified? d) How will the mitigation ensure that the carbon footprint is not unnecessarily high? e) Who should be consulted with, how should it be approved, and what monitoring measures are appropriate?</p> <p>Please could the local authorities and the Environment Agency comment?</p>	<p>b) Specify how GHG will be benchmarked and monitored. c) Benchmarking & pre-construction data collection followed up by environmental monitoring and traffic flow data (enhanced with ANPR and speed information to give accurate GHG outputs). d) Mitigation should ensure that the carbon footprint is not unnecessarily high through mandating of use of innovative, low embodied carbon materials, local supply chain and other methods to deliver an exemplary low CO2 delivery (guidance available through Institution of Civil Engineers).</p> <p>Campaign for Better Transport. Institution of Civil Engineers. Monitoring as above in part “c.”</p>	<p>The Carbon Management Plan (CMP) for the Scheme will set out targets, as well as actions and responsibilities for delivering them. The CMP will also be aligned with the National Highways Net Zero Plan.</p> <p>A carbon model will be produced using the Preliminary Design, as submitted for the DCO application. This is the precursor to the Detailed Design phase, which will be used as the carbon baseline/benchmark. Carbon reductions will then be monitored against this during Detailed Design as lower carbon options are developed and assessed, and during construction as fuel consumption performance is monitored.</p> <p>The CMP will include procedures for carbon modelling of options assessment and whole scheme modelling and reporting, including references and assumptions. The methodology follows all of the main technical standards including PAS 2080 Carbon Management in Infrastructure, RICS and iStructE.</p> <p>Carbon reduction targets are specified for the whole Scheme, to be delivered through action taken throughout the Scheme development.</p> <p>The baseline model is developed using pre-construction data collated from the relevant project disciplines, e.g. civil engineering and construction planning data, and air quality assessments. A post construction model will also be produced using actual engineering and construction data.</p>
8.16	Do the local authorities or the Environment Agency have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy with respect to climate change?	Yes. Potential Impact and Compliance with Policy. On the basis of information available at this time it is challenging to understand how having possession of the facts in terms of the deleterious effects of passenger car transport and road freight on both GHG and other emissions (e.g. particulates) – that the delivery of a road scheme that increases the volume of traffic in a given location will do anything other than increase carbon emissions (additionally the CO2 emissions of delivering the actual project and the loss of natural capital).	<p>Please refer to the response question 8.3 in the National Highways response to Examining Authorities First Written Questions (REP2-021) for consideration of the significance of increased GHG emissions due to the Scheme.</p> <p>Please see 8.11 above in these responses for consideration of how other emissions have been assessed.</p> <p>In relation to natural capital, please refer to the response question 8.14 in the National Highways response to Examining Authorities First Written Questions (REP2-021) for consideration of sequestration and carbon off-setting.</p>
12.20	Various mitigation measures are proposed by the Applicant. These include, but are not limited to, the provision of structures to shelter bats, a new badger sett, new watercourses, hedgerow and tree planting and crossings of the proposed works for various species.	e) The mitigation/compensation measures proposed on the surface appear standard but there is a lack of detail on many of the measures. As one example the diagram of the proposed bat structure appears to be missing. Much of the success, or not of the mitigation/compensation will be dependent on detailed design, timing and location; a mammal tunnel that floods for example is highly unlikely to be used by terrestrial mammals	It is considered in principle, that the outlined mitigation measures are appropriate and fit for purpose, with the further details and refinement being provided at the detailed design stage. Despite this, the locations of the mitigation measures (such as dedicated bat roosting structure, mammal crossing points, and habitat locations) have all been provided within the Landscape Masterplan with specifications provided within the ES. The

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	<p>a) At what point during the construction phase would each of these mitigation measures be constructed?</p> <p>b) Please could the Applicant explain how long these measures would take to establish before they would provide mitigation?</p> <p>c) What evidence is there that such measures provide effective mitigation?</p> <p>d) What measures would be provided to mitigate the effects of the scheme should these measures prove ineffective and how would these be secured?</p> <p>e) Do the local authorities have any comments?</p>		<p>outlined mitigation measures have all been provided specifically to address any potential impacts upon protected/priority species and habitats and take into consideration any local or site-specific factors.</p> <p>In regard to the dedicated bat structure, overview details have been provided, however, the final design would be provided at the detailed design stage. In principle, the size of the structure would be approximately 4-6 m high x 1-2 m width and be of cylindrical design based on existing natural stone vent structures (primarily the Mottram aqueduct air vents) within the local area (see images below). The proposed bat structure would be based on a design of this character using a cylindrical design with an appropriate roof structure. The final design of the structure will form part of the European Protected Species Mitigation licence and will be designed in full consultation with Natural England.</p> <p>The location of the mammal crossing points have been chosen within locations that would not be subject to flooding (such as located high within the embankments and false cuttings), can be installed at a light angle (to ensure water is not retained within the crossing structure), and would remain dry and be suitable for terrestrial mammals year-round.</p>
13.4	<p>Paragraphs 5.165 to 5.167 of the NPSNN state that existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.</p> <p>a) The Proposed Development would result in the permanent loss of land and amenity impacts on the public park/garden (communal yard behind 2 to 15 Old Road) and open space (Land adjacent to Mottram Moor Farm). Should the loss of this land be considered against paragraphs 5.165 to 5.167 of NNNPS?</p> <p>b) The Councils comments are requested on the loss of this land.</p> <p>What certainty is there that the cricket ground is unused, and is there any evidence to demonstrate how long it would be affected?</p>	<p>a) Yes.</p> <p>b) The applicant should draw reference to the Council's most up to date Open Space Review.</p> <p>d) The cricket club appears to have been unused for a considerable amount of time and has since relocated. The site would be affected permanently. Reference should be made to the Council's Playing Pitch Strategy to confirm.</p>	<p>As set out in National Highways' response to Sport England's Relevant Representation (RR-0814-1 in REP1-042), the area for the disused former cricket pitch is identified within the Tameside Open Space Review 2018 the Site's typography to be 'Natural space and countryside', with its primary purpose described as 'wildlife conservation, biodiversity and environmental education and awareness'. The Site is not identified as land for Outdoor Sport/ Recreation in this document, and Tameside Playing Pitch Strategy 2015-2025 (2016) does not list the site as required for cricket.</p>
13.16	<p>Are there any other comments with respect to:</p> <ul style="list-style-type: none"> agricultural land or soils; local social and economic impacts; human health; 	<p>The impact on and loss of agricultural land does not appear to have been included in the Environmental Statement.</p>	<p>An assessment of the impact and loss of agricultural land during the construction and operation phase of the Scheme is contained in the Environmental Statement Chapter 12 Population and Human health (REP2-040). The assessment methodology for the assessment on land use and health follows the requirements set</p>

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	<ul style="list-style-type: none">mitigation and opportunities for enhancement; and any other policy and factual issues?		<p>out in DMRB LA 112 and is also summarised in Sections 12.3 and 12.4 of REP2-040.</p> <p>Paragraphs 12.9.12 to 12.9.17 and Table 12.17 of Chapter 12 of the ES (REP2-040) summarises the residual land use effects on agricultural land holdings during construction. The Scheme would affect seven agricultural farm holdings resulting in 24ha of permanent land take and 8.3ha of temporary land take. Additionally around 2ha of farm holding will be reduced in height for flood compensation. Mitigation in the form of underpasses and alternative accesses is built into the Scheme design, where possible, to prevent permanent severance. The residual effect of agricultural land take and severance on individual holdings was assessed as being moderate or large adverse during construction, which is significant.</p> <p>Paragraph 12.9.42 to 12.9.44 of REP2-040 describes the operational impacts on agricultural land and concludes that permanent land acquisition and severance will have a moderate to large adverse effect on agricultural land holdings, which is significant.</p> <p>The loss of land and resultant severance of agricultural land was assessed to have a negative health outcome during construction reducing to neutral during Operation of the Scheme as described in paragraph 12.9.60 and table 12.26 of REP2-040.</p>

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