

**A57 Link Roads**

**TR010034**

**9.88 Applicant's comments on Deadline 11  
submissions**

Rule 8 (1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

May 2022

# Infrastructure Planning

## Planning Act 2008

### Infrastructure Planning (Examination Procedure) Rules 2010

### A57 Link Roads Development Consent Order 202[x ]

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#### 9.88 Applicant's comments on Deadline 11 submissions

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<b>Regulation Number:</b>	Rule 8 (1)(k)
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# 1. Introduction

- 1.1.1. This document provides the comments of the applicant, National Highways, in response to the Submissions made at Deadline 11 as requested by the Examining Authority at Deadline 12 in its amended Rule 8 letter dated 11 April 2022. Comments have been provided on the following documents:
- REP11-013 High Peak Borough Council - Responses to the Examining Authority's Third Written Questions – Annex;
  - REP11-014 High Peak Borough Council - Responses to the Examining Authority's Third Written Questions;
  - REP11-015 Jeff Brown - Responses to the Examining Authority's Third Written Questions;
  - REP11-016 Mike Reed - Responses to the Examining Authority's Third Written Questions;
  - REP11-017 Tim Nicholson on behalf of Peak District National Park Authority - Responses to the Examining Authority's Third Written Questions;
  - REP11-018 Stephen Bagshaw - Responses to the Examining Authority's Third Written Questions;
  - REP11-020 Climate Emergency Policy and Planning (CEPP) - Response to Applicants Submission at Deadline 10;
  - REP11-022 CPRE Peak District and South Yorkshire - Response to Applicants Submission at Deadline 10;
  - REP11-023 Environment Agency - - Responses to the Examining Authority's Third Written Questions (ExQ3) and response to Applicants submission at Deadline 10;
  - REP11-024 Peter Simon - Response to the Applicant's comments at Deadline 10 (REP10-010); and
  - REP11-025 Sharefirst My Journey to School - Comments on Response to Written Submissions at Deadline 10.
- 1.1.2. National Highways has sought to provide comments where it is helpful to the Examination to do so. National Highways has not responded to every submission for instance, because the submission was very short, or because it contained expressions of opinion without supporting evidence. Where National Highways has chosen not to comment this is not an indication National Highways agrees with the point or comment raised or opinion expressed.

## 2. REP11-013 High Peak Borough Council - Responses to the Examining Authority's Third Written Questions – Annex

Reference	IP Issue	NH Response
9.88.1	<p>7 Air Quality:</p> <p>a) Please could High Peak Borough Council provide an update on the matters that it has noted [REP8-025] as not being resolved, including with respect to:</p> <ul style="list-style-type: none"> <li>speed band emission rates used in the air quality assessment Discussions between NH and High Peak have explained the use of speed bands, notably the emissions allocated to predicted speeds and how this compares with the Defra EFT v10.1. National Highways speed band emission factors typically represent the Defra EFT v10.1 emissions for the mid point of the speed band range. This means that National Highways speed band emission factors are likely to predict lower than Defra EFT v10.1 for speeds at lower range of a speed band, but overpredict Defra EFT v10.1, for speeds for upper range of a speed band e.g the “lightly congested” speed band is 20 – 40 kph, so roughly speaking below 30kph it will underpredict and above 30 kph it will overpredict, with the difference increasing as you move away from the midpoint. National Highways state that considering absolute modelled speeds in the study area the use of National Highways speed band emission factors on balance would provide an overall outcome consistent with Defra EFT 10.1 had these emission factors been used. It is difficult to validate this statement in the absence of sensitivity analysis but generally speaking, the speed band data used on roads provided in the study area provided by NH to High Peak did, anecdotally, appear did appear to be fairly evenly distributed across the speeds band which initially would appear to concur with NH statement. The above noted, whilst the allocation of the speed bands is understood, the actual speed ascribed to the roads in the study area, is a function of the traffic model and how this interacts with the movement of the traffic, and / or how accurate this is, particularly as the traffic is considered to be lightly congested and that that only minimal changes from DM allocated speed band are expected as a result of the scheme (D/S) – see below</li> </ul>	<p>The Applicant's position is provided in the Deadline 12 submission of the final Statement of Common Ground with High Peak Borough Council (TR010034/APP/8.3(3)).</p>
9.88.2	<ul style="list-style-type: none"> <li>routing of traffic in Glossop from the A57 onto Shaw Lane and Dinting Road As noted HPBC still do not fully appreciate the criteria /logic in the Transport model that causes traffic to divert from the more direct A57 route through Glossop and use Dinting Road / Shaw lane. One would expect perhaps the traffic to divert from routes (speed bands) that are classed as “heavily congested” to routes perceived to be less congested “e.g lightly congested or free flowing” but this is not obvious in the initial speed band data provided by HE. It is not yet agreed that for the forecast model to change significantly this would require these roads to become less desirable, as it is not yet clear to us that they the likely preferred route, for the reasons raised previously on numerous occasions. The crucial question is the forecast model representing likely traffic movements (I would also note traffic numbers here). To that end and as noted above, it would be desirable to not include a sensitivity tests on traffic flow should Shaw lane / Dinting Lane not be used to the extent predicted.</li> </ul> <p>NH acknowledged at our meeting of 26th April that the model had not been calibrated to take account of on-street parking on Shaw Lane nor had the assumptions of traffic movement along (e.g limited constraints) along Shaw lane/ dinting road been validated directly.</p>	<p>The traffic modelling used for the assessment of the Scheme has been developed, calibrated and validated in accordance with Department for Transport (DfT) Transport Analysis Guidance (TAG) and has been accepted by Derbyshire County Council (DCC) as fit for purpose. As set out in their responses to the Examining Authority's Third Written Questions (Written Question 3.11) at Deadline 11, both Derbyshire County Council (REP11-012) and Tameside Metropolitan Borough Council (REP11-018) state that they have no remaining concerns with regards to transport networks and traffic.</p> <p>The traffic model is robust and provides the best indication of how future traffic demand will use the road network in response to changes in the operation of the modelled road network due to the Scheme compared to without it, whilst accounting for forecast traffic growth and other committed future modifications to the road network.</p> <p>The traffic model is a conventional equilibrium assignment model that equates user benefits, in terms of travel costs consisting of value of time and vehicle operating cost, for any alternative routes between any given origin and destination. In uncongested conditions traffic would be modelled as using the A57 in preference to Shaw Lane/Dinting Road as it is a shorter route through Glossop. In the congested conditions , the modelled travel times on the A57 rise sufficiently such that the alternative route is no longer less beneficial for users. As congestion worsens further, more modelled traffic is routed via the alternative which compared to the A57 is relatively ‘free-flow’. Provided the forecast flows on the alternative route remain small (which</p>

Reference	IP Issue	NH Response
	<p>There therefore remains concern that the model may be “overly optimistic” in its allocation of the percentage of the increased traffic as a result of the scheme onto Shaw Lane /Dinting Lane. The knock on effect of this assumption may mean that the changes in numbers as/ or speed bands, along the A57, may trigger the scoping criteria DMRB LA 105 for the assessment of the two AQMA’s</p>	<p>they do), it remains relatively ‘free flow’ as more forecast traffic is added. In contrast, the A57 where forecast to be congested is such that any additional traffic will cause additional delay to all traffic on the route.</p> <p>For the routing of traffic across the modelled road network to substantially alter from that forecast by the traffic modelling, physical measures or schemes would need to be introduced onto the road network, such as changes in speed limits, traffic calming measures, additional traffic signals, etc., that would cause drivers to choose alternative competing routes. Any such proposed modifications to the road network are not currently proposed and would be subject to an impact assessment prior to implementation that would need to consider the diversionary impact of the scheme on traffic and the consequential environmental effects. Consequently, the forecast traffic flows across the modelled road network are considered to represent a reasonable and appropriate worst-case scenario of the traffic impacts of the Scheme through Glossop.</p> <p>If traffic was somehow prevented or discouraged from using Dinting Road and Shaw Lane by modifications outside of the Scheme, then additional traffic modelling would need to be undertaken to understand the likely traffic redistribution effects across the road network, which would not necessarily mean that traffic flows on any one alternative route, such as the A57 through Glossop (including Glossop AQMA), would increase. This is because there are likely to be wider, resulting, traffic redistribution effects.</p> <p>The speed bands used for the air quality assessment are directly derived from the forecast traffic speeds in the traffic model. The speed band/levels of congestion categories used in the air quality assessment are those defined in DMRB LA105 and are relatively wide, so average traffic speeds can vary within each speed band sufficiently to alter the relative journey times via competing routes in the traffic model without a change in the speed band. Therefore, traffic can change its choice of route in the traffic model even where speed bands on competing routes are the same in both the Do-minimum and Do-something scenarios.</p> <p>Regarding accounting for on-street parking along Shaw Lane in the traffic model, please refer to Applicant's written Summary of Issue Specific Hearing 3 (9.75.10 – REP8-019).</p> <p>Consequently, National Highways does not consider it necessary or appropriate to undertake a sensitivity test.</p>
9.88.3	<ul style="list-style-type: none"> <li>the inclusion of Air Quality Management Areas in the air quality study area HPBC’s key concern remains that impact of the scheme on the designated AQMAs, should have been included on a precautionary basis; HPBC agreed that the appropriate scoping criteria for National Highway’ road schemes had been used (following DMRB LA 105) in the Air Quality assessment However, as noted, there remains concerns over the accuracy of the traffic data that used to drive the scoping criteria, Notably, the changes in traffic numbers and/ or changes in speed bands.</li> </ul>	<p>The Applicant’s position is provided in the Deadline 12 submission of the final Statement of Common Ground with High Peak Borough Council (TR010034/APP/8.3(3)).</p>



Reference	IP Issue	NH Response
9.88.4	<ul style="list-style-type: none"> <li>human health receptors on the A57 in Brookfield Identification of the receptors (figure 5.4) used in the compliance risk assessment (using LAQM “conservative” forecast”) indicated that “large” change at some of the receptors along Brookfield. However, it also highlighted that some of these were human health receptors that had not been included as receptors in the (less conservative) primary human health AQ assessment (DMRB LA 105). Therefore, HPBC have requested that these receptors are also assessed in accordance with the DMRB LA 105 . Following further discussion and clarification (virtual meeting held 8th April 2022) it was agreed that a sensitivity test will be undertaken to identify the air quality impact at relevant qualifying feature receptors located adjacent to the A57 Brookfield under the DMRB LA 105 human health assessment methodology (to be submitted by National Highways at deadline 11 – ref. TR010034/EXAM/9.86) Results from the updated air quality assessment updated DMRB LA 105 indicated a “Large increase” in NO2 DS compared to DM in 2025, at locations along Wooley Bridge with 1 location exceeding the AQO (40ug/m3) as a result of the scheme.</li> </ul>	<p>The Applicant’s position is provided in the Deadline 12 submission of the final Statement of Common Ground with High Peak Borough Council (TR010034/APP/8.3(3)). The supplementary air quality assessment for Brookfield is provided in REP11-011. It states that, [for receptors exceeding air quality standards] given the number of receptors (75 receptors) that experience a decrease in concentrations with the Scheme, it is still considered that this outweighs the one receptor with a ‘small’ increase in concentration and one receptor with a ‘large’ increase in concentration with the Scheme. Overall, as reported in the ES, the impact of the Scheme is an improvement in air quality for human health receptors and there is not a significant adverse effect due to the Scheme (paragraph 6.1.2 of REP11-011).</p>
9.88.5	<p>b) What are the likely implications for the adequacy of the Applicant’s assessment and for their identification of significant effects?</p> <p>The accuracy of the model is extremely hard to predict and is only as accurate as the data provided / chosen. It is noted that the modellers did the best with the tools (and constraints) available to them, which includes using the data provided by the traffic model. Nevertheless, it is considered that the model does suffer from the fact that the adopted methodology (DMRB) is designed for the large schemes, and the validation of the model was not ideal (as discussed with regard to the historic data used and gradient effects) There still remain concerns over the traffic data / and or movement of traffic around Glossop area, which could lead to errors in both the screening criteria and / or changes in speed bands.</p>	<p>The Applicant’s response is provided in the Applicant's responses to Examining Authority's Third Written Questions (ExAQ3) (REP11-010).</p>
9.88.6	<p>c) Should further mitigation be provided?</p> <p>Yes, it would be anticipated that NH would work with HP in identifying and addressing any deterioration in AQ as a result of the scheme. A requirement could be applied to ensure appropriate monitoring of air quality within the AQMAs and Brookfield, post-opening of the scheme, is undertaken by the National Highways to validate the assumptions to screen out these areas, on the basis they will not significantly impact on air quality in these areas. Should this assumption prove incorrect, National Highways should ensure that mitigation is agreed with HPBC and delivered by National Highways if necessary.</p>	<p>The Applicant’s position is provided in the Deadline 12 submission of the Statement of Common Ground with High Peak Borough Council (TR010034/APP/8.3(3)).</p>

### 3. REP11-014 High Peak Borough Council - Responses to the Examining Authority's Third Written Questions

Response Reference	Question number	Examining Authority Third Written Question	IP Response	National Highways' response
	1.	<b>The draft Development Consent Order (dDCO) and other consents</b>		
9.88.7	1.10	<p>The Applicant [REP8-019 Question 7dd] suggested wording for an additional requirement to address the ExA's concerns [EV- 039].</p> <p>a) Please could the Applicant, Tameside Metropolitan Borough Council and High Peak Borough Council seek to agree the wording and provide a coordinated response?</p> <p>b) Please could the Applicant add the agreed wording to the dDCO?</p>	<p>The applicant has suggested the following amendments which is acceptable to HPBC.</p> <p><i>"Where the undertaker is acting further to Section 61 of the Control of Pollution Act 1974 in relation to the construction of the authorised development the undertaker shall include particulars in any application pursuant to Section 61 of the Control of Pollution Act 1974 to demonstrate that the works the subject of the application, including the method by which they are to be carried out and the steps proposed to be taken to minimise noise resulting from the works, would not give rise to any materially new or worse noise effects to those in comparison with those reported in the environmental statement".</i></p>	<p>National Highways confirms that this wording has been included in the final dDCO submitted at deadline 12.</p>
9.88.8	1.12	<p>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, the Environment Agency, and Natural England summarise any remaining concerns that they have about the dDCO?</p>	<p>If the ExA is minded to recommend to the SoS that the scheme is approved without any further consideration of the implications for the AQMAs in High Peak, it may wish to consider the scope for an additional requirement.</p> <p>In such circumstances, a requirement could be applied to ensure appropriate monitoring of air quality within the AQMAs post-opening of the scheme is undertaken by the National Highways to validate the assumptions to screen out these areas, on the basis they will not significantly impact on air quality in these areas. Should this assumption prove incorrect, National Highways should ensure that mitigation is agreed with HPBC and delivered by National Highways if necessary.</p>	<p>National Highways has engaged with HPBC and DCC to demonstrate how the transport modelling and air quality assessment does not support the inclusion of AQMAs nor provide any evidence that there will be any likely significant effects. Consequently, National Highways disagrees that a further air quality monitoring requirement covering the AQMAs can be justified or is necessary.</p> <p>However should the Examining Authority consider a requirement to be necessary, then National Highways refers the Examining Authority to Requirement 16 on the A14 Cambridge to Huntingdon Improvement Scheme DCO, which could be adapted to prevent the scheme from being brought into use until air quality monitoring is installed and subsequently maintained limited to a maximum period of 3 years. National Highways draws the Examining Authority's attention to sub-requirement 16(6) which requires a demonstration that it reasonably appears that the authorised development has materially worsened air quality such that there are exceedances of national air quality objectives, at which point National Highways must discuss and agree a scheme of mitigation with the relevant Council and secure approval from the Secretary of State.</p> <p>Notwithstanding National Highways' position that an air quality monitoring requirement is not necessary, in the event that the ExA consider such requirement necessary, a</p>



Response Reference	Question number	Examining Authority Third Written Question	IP Response	National Highways' response
				<p>suggested adaptation of the A14 Requirement 16 is provided below:</p> <p>16.—(1) Before the authorised development is first open to traffic the undertaker must install diffusion tube monitors within the Dinting Vale and Glossop air quality management areas in locations closest to the authorised development to be agreed with the relevant planning authority.</p> <p>(2) The specification for installation, operation and data provision must be agreed in writing with the relevant planning authority prior to the commissioning of monitoring.</p> <p>(3) The undertaker must operate the monitors installed under sub-paragraph (1)—</p> <p>(a) for a period of at least 3 years from the opening of the authorised development for public use, and until such time that the monitoring shows a continuous period of 12 months with no exceedances of national air quality objectives or European Union limit values for the pollutants monitored;</p> <p>(b) in line with guidance on air quality monitoring issued by the Department for Environment, Food and Rural Affairs from time to time; and</p> <p>(c) in each case, in accordance with the specification for installation, operation and data provision prepared under sub-paragraph (2).</p> <p>(4) The relevant planning authority must support the undertaker where possible in facilitating the installation of the air quality monitoring equipment to be operated by the undertaker under sub-paragraph (1).</p> <p>(5) During the time period mentioned in sub-paragraph (3)(a)—</p> <p>(a) the undertaker must make all data obtained from the monitors available to the relevant planning authority; and</p> <p>(b) each relevant planning authority must supply to the undertaker all air quality monitoring data obtained from its existing air quality monitors on an annual basis.</p> <p>(6) If, following analysis by the undertaker in consultation with the relevant planning authority of the monitoring data mentioned in sub-paragraph (5), it reasonably appears that the authorised development has materially worsened air quality such that there are exceedances of national air quality objectives, or European Union limit values for the pollutants monitored, the undertaker must discuss and agree with the relevant planning authority on a scheme of</p>

Response Reference	Question number	Examining Authority Third Written Question	IP Response	National Highways' response
				mitigation, which must be submitted to the Secretary of State for written approval. (7) Before considering whether to approve the scheme of mitigation, the Secretary of State must consult the relevant planning authority and take in to consideration any local air quality action plans adopted by the relevant planning authority as part of its local air quality management duties. (8) The scheme of mitigation approved under sub-paragraph (6) must be implemented by the undertaker.
	3.	Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders		
9.88.9	3.11	Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority and summarise any remaining concerns that they have about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?	It is now understood that a pedestrian crossing point is to be provided by Derbyshire County Council across Dinting Road to support the expanded Glossopdale School site in Hadfield.	Regarding the possibility of a pedestrian crossing on Dinting Road and its impact on forecast routing of traffic across the network, please refer to the Applicant's Comments on Deadline 9 Submissions (9.84.39 - REP10-010).

#### 4. REP11-015 Jeff Brown - Responses to the Examining Authority's Third Written Questions

Reference	IP Issue	NH Response
9.88.10	<p>Dear sir,</p> <p>Regarding 10.3, question a) and b). Unfortunately, I'm not happy that the information and answer from the applicant are satisfactory. One might imagine a scenario where "the cowboys ride off into the sunset", leaving those behind to pick up the pieces.</p> <p>For the applicant's statement - "Any damage to assets not owned by the applicant in relation to the scheme will need to be rectified by the applicant" - seems inadequate considering what is at stake for risks imposed to non-HA assets. For example, who might decide and pay for the determination that any damage has actually occurred, surely this would need to be an independent body? Clearly, if anything did happen it would be our word against the applicants. Therefore, please will the applicant provide copies or references of the applicant's internal processes and procedures for this matter? I'm not trying to get compensation, but I do not wish to live have these risks imposed on us unless there is a robust and independent protection process in place.</p> <p>In addition, regarding surveys, would there the applicant consider special provision for properties that might be more at risk - for example, our property was built in the early 1700's so might need additional processes for its protection (it is also grade 2 listed). Or would the applicant consider that all properties in the area would be treated the same irrespective of their age and methods of construction?</p> <p>Regarding 11.6 the well on our property is listed in the deeds of the property with some ancient mention of Dial Cottage - it would need to be studied by a legally qualified person.</p> <p>Yours, Jeff Brown</p>	<p>Please refer to National Highways' response to Applicant's responses to Examining Authority's Third Written Questions (ExQ3) (REP11-010), in respect of Third Written Questions 11.6 and 11.7.</p> <p>As explained in respect of Third Written Question 11.6 Requirement 6 of the draft Development Consent Order has been agreed with the Environment Agency (EA) and imposes a requirement on National Highways to prepare a groundwater monitoring programme and a dewatering management plan that each have to be approved by the Secretary of State in consultation with the EA. The purpose of those documents is to establish the existing groundwater conditions and to monitor them to prevent dewatering from occurring. The monitoring programme will have regard to the specific circumstances and the properties concerned. Thereafter the approved monitoring will be able to confirm the position regarding the prevention of dewatering or otherwise. The Environment Agency provide independent oversight through Requirement 6 and through the licensing regime for the abstraction of water.</p>

## 5. REP11-016 Mike Reed (Tameside MBC) - Responses to the Examining Authority's Third Written Questions

Response Reference	Question number	Examining Authority Third Written Question	IP Response	National Highways' response
	5.	<b>Other landscape and visual, design, Green Belt</b>		
9.88.11	5.2	<p>The Applicant [REP9-027] has updated the Design Approach Document [REP9-008 Annex C2] in response to concerns raised by High Peak Borough Council [REP8-025] regarding references to local policy.</p> <p>a) Does High Peak Borough Council have any comments on the Applicant's updates?</p> <p>b) Do the local authorities or Peak District National Park Authority have any remaining concerns about the Design Approach Document?</p>	<p>b) The Design Approach Document has been updated to include reference to supplementary planning documents in High Peak. TMBC consider there is a need for comprehensive reference to adopted design policy including that in Tameside. As such, there should at least be reference to the following:</p> <p>Tameside Unitary Development Plan (2004) policy 1.3 creating a cleaner and greener environment; and Tameside's Trees and Landscaping on Development Sites Supplementary Planning Document 2007.</p> <p>TMBC has no other comments or remaining concerns related to the Design Approach Document.</p> <p>We are confident that any other issues can be overcome during the detailed design phase.</p>	<p>The Design Approach Document (TR010034/EXAM/9.73) has been updated following TMBC's comments to include the two policies identified. The updated document has been submitted as part of the Deadline 12 submission. The Design Approach Document is also being included as Annex C.1 in the final consolidated First Iteration of the Environmental Management Plan (EMP) (First Iteration) submitted at Deadline 12.</p>
9.88.12	5.4	<p>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of landscape, visual, design, or the Green Belt?</p>	<p>TMBC do not see anything specific in the 7.2 Environmental Management Plan (First Iteration) regarding planting mixes beyond a sentence in paragraph 5.2 which states "Key planting and landform proposals will be developed and detailed to reflect the locale and great attention will be paid to the final slope profiles and gradients as well as the planting mixes, which will reflect local successful species and take account of future pressures that climate change and resilience will bring". To ensure the term "local successful species" could not technically include undesirable species that are very successful we request that the term be changed to locally native species.</p> <p>Apart from issues covered elsewhere on landscape, visual, design or the Green Belt, TMBC have no further comments.</p> <p>TMBC confirms its support for the Very Special Circumstances, as set out by the Applicant in RE06-017 (9.75.108 (aa)).</p> <p>TMBC are confident that any other issues can be overcome during the detailed design phase.</p>	<p>The Applicant assumes that this comment refers to the Design Approach Document rather than the EMP (First iteration) as no such reference exists in the main EMP document. A reference to 'locally successful species' only exists in the Design Approach Document (Annex C.1 of the EMP (First Iteration)).</p> <p>As a result, the Design Approach Document (TR010034/EXAM/9.73) has been updated following TMBC's comment and submitted as part of the Deadline 12 submission. The Design Approach Document is also being included as Annex C.1 in the final consolidated First Iteration of the Environmental Management Plan (EMP) (First Iteration) submitted at Deadline 12.</p> <p>National Highways notes and welcomes the support provided by TMBC to the Scheme case regarding Very Special Circumstances.</p>

## 6. REP11-017 Tim Nicholson on behalf of Peak District National Park Authority - Responses to the Examining Authority's Third Written Questions

Response Reference	Question number	Examining Authority Third Written Question	IP Response	National Highways' response
	2.	<b>General matters</b>		
9.88.13	2.1.	<p>Apart from the issues covered elsewhere in these third written questions or in their signed Statements of Common Ground, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, the Environment Agency, and Natural England summarise any remaining concerns that they have about the:</p> <ul style="list-style-type: none"> <li>• Case for the Scheme [REP2-016]</li> <li>• Environmental Management Plan (First Iteration) [REP9- 008]</li> <li>• Register of Environmental Actions and Commitments [REP9-009]</li> <li>• Works Plans [REP9-002], Streets, Rights of Way and Access Plans [REP9-003], Scheme Layout Plans [REP8- 004], and Engineering Drawings and Section Plans [REP5-005]</li> <li>• compliance of the Proposed Development with relevant legislation and policy, including local policies</li> <li>• any other important and relevant matters, including in relation to the ExA's Initial Assessment of Principal Issues [PD-005]</li> </ul>	<p>• Case for the Scheme [REP2-016]</p> <p>The Peak District National Park Authority believes that the assessment made in the Case for the Scheme [REP2-016] with regard to tranquillity within the National Park is inaccurate. In paragraph 7.13.5, the applicant states that: -</p> <p>“Several arterial traffic routes already pass through the NCA including Woodhead Road (A628), Snake Road (A57) and Glossop Rd (A624). It is likely that the flow of traffic on the routes, and numbers of vehicles, are subject to variation, between seasons, hour of the day and day. Noise and movement on these routes is constant and easily perceptible. The effects of these existing roads undermine the tranquillity and wildness of the PDNP and landscape character area.”</p> <p>The National Park Authority accepts that the high levels of traffic on the A628(T) Woodhead Road already delivers a fairly constant hum of noise and regular visual disturbance as stated within our Deadline 9 submissions. We do not however believe that this justifies worsening this effect in any way.</p> <p>In the case of the A57 Snake Pass. Current levels of traffic are relatively low (3,050 AADT – source Appendix 2.1 of the Environmental Statement). This means that currently there can be relatively long periods in which traffic does not negatively impact on the quiet enjoyment of the National Park or its tranquillity. With the scheme, there is a predicted 38% increase in average daily traffic flows along the route.</p>	<p>National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.</p>



Response Reference	Question number	Examining Authority Third Written Question	IP Response	National Highways' response
			<p>In paragraph 7.13.15 [REP2-016], the applicant states: -</p> <p>“There would be a traffic change through the PDNP as a result of the Scheme, however, these changes vary depending on the route and the time of day. It is not considered that there would be any significant indirect effects to the landscape character or visual amenity within the PDNP due to these traffic changes.”</p> <p>The National Park Authority believes that an increase in traffic flows of this nature will be detrimental to the tranquillity of the area and the quiet enjoyment of the National Park by its residents and visitors.</p> <ul style="list-style-type: none"><li>• Environmental Management Plan (First Iteration) [REP9- 008]</li><li>• Register of Environmental Actions and Commitments [REP9-009]</li></ul> <p>The Peak District National Park Authority has no remaining concerns with regard to the Register of Environmental Actions and Commitments [REP9-009], beyond those previously expressed regarding indirect impacts of the scheme on the National Park.</p> <ul style="list-style-type: none"><li>• Works Plans [REP9-002], Streets, Rights of Way and Access Plans [REP9-003], Scheme Layout Plans [REP8- 004], and Engineering Drawings and Section Plans [REP5-005]</li></ul> <p>The Peak District National Park Authority has no remaining concerns with regard to the Works Plans [REP9-002], Streets, Rights of Way and Access Plans [REP9-003], Scheme Layout Plans [REP8- 004], and Engineering Drawings and Section Plans [REP5-005]</p>	

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			<ul style="list-style-type: none"><li>compliance of the Proposed Development with relevant legislation and policy, including local policies</li></ul> <p>During the Examination, the Peak District National Park Authority has expressed concerns about the Applicant's consideration of the role of the National Planning Policy Framework and its requirements in regard to the Peak District National Park.</p> <p>We also believe that the delivery of the scheme will have indirect, but negative effects on the National Park. These effects are predicted to occur not only on the Strategic Road Network, but on local roads, with our principle concern being in relation to the A57 Snake Pass. In effectively disregarding the albeit indirect negative impacts of the scheme on the National Park, we believe that the applicant is not fulfilling its statutory duty under Section 62 of the Environment Act, to have regard to National Park purposes. This duty applies to works undertaken either on land within a national park, or which affects land within a national park.</p> <p>CPRE Peak District and South Yorkshire submitted a letter to the Examining Authority at Deadline 10. The letter, which was submitted on behalf of number of bodies and individuals who have appeared at the Issue Specific Hearings and / or made written representations to the Examination. The letter raises concerns about the evidence base used in support of the scheme. It further suggests that issues with the evidence base cast doubts on the scheme's adherence to "the Planning Act 2008, the 2017 EIA Regs and Guidance, National Highways Licence agreement, Transport Decarbonisation Plan, Bus Back Better, Gear Change, Greater Manchester Right Mix policy, WebTAG Appraisal, IEMA guidance and NPSNN".</p> <p>The Peak District National Park Authority is not in a position to be able to comment directly on the validity of the points raised within the letter. However, in the interests of ensuring that the application is fully compliant with the relevant legislation and policy, we would be keen to see evidence</p>	

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			<p>from the applicant to ensure that the concerns of CPRE Peak District and South Yorkshire et al are addressed.</p> <ul style="list-style-type: none"> <li>any other important and relevant matters, including in relation to the ExA's Initial Assessment of Principal Issues [PD-005]</li> </ul> <p>The Peak District has no additional important or relevant matters that have not already been covered in our previous written and verbal representations.</p>	
	<b>3.</b>	<b>Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders</b>		
9.88.14	3.11	<p>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority and summarise any remaining concerns that they have about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?</p>	<p>The Peak District National Park Authority remains concerned about the impact of additional traffic flows on National Park roads as a result of the scheme. We are concerned about the impact of additional traffic flows on the amenity of users of public rights of way and walking, cycling and horse-riding routes of National importance.</p> <p>As referred to in previous representations, crossing conditions for routes on the A628 (T) including the Pennine Way, the Pennine Bridleway and the Trans Pennine Trail are challenging under the current levels of traffic. Additional traffic flows arising from the scheme will only serve to worsen the situation.</p> <p>On the A57 Snake Pass, there are a number of walking routes that are separated for some distance and the only links between them are through road / verge walking. Again, even with existing levels of use this is an unpleasant experience, with traffic often passing close to vulnerable users and at relatively high speeds (the road has a 50mph speed limit). The geography of the road, undulating with tight bends and limited verges and roadside stone walls makes this an unwelcoming environment for those linking footpaths / bridleways. A 38% increase in traffic will worsen conditions for vulnerable users. The A57 Snake Pass is a popular route for road cyclists and they will also be negatively affected by the predicted increase in traffic.</p>	<p>National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority submitted at Deadline 12 (TR010034/EXAM/9.13(2)), and that these comments are included in the final Statement of Common Ground, where National Highways has provided responses and the status of the issue is 'not agreed'.</p>

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			<p>It is worth noting that the A628(T) is subject to two very challenging junctions: -</p> <p>i) The junction between the A628 and the A6024 (Holme Moss) road</p> <p>ii) The junction between the A628 and the B6105 (Devil's Elbow) road</p> <p>Both of these junctions feature acute angles and poor levels of visibility in at least one direction for those joining the A628. This makes left turns hazardous (the centre line is often crossed) and right turns extremely problematic. In particular, visibility for right turners from the A6024 onto the A628 necessitates crossing the east-bound lane to obtain a sufficient view eastward of on-coming westbound traffic.</p> <p>The up-to almost 1,000 vehicles per day increase along the A628 will worsen this situation.</p>	
	4.	<b>Peak District National Park</b>		
9.88.15	4.2	Please could Peak District National Park Authority comment on the Applicant's response [REP9-027] to their written summary of oral submissions regarding Peak District National Park [REP8-026]?	<p>9.79.9 – There appears to be a lack of agreement between the applicant and National Park Authority with regard to the relevance of the National Planning Policy Framework and the Environment Act to this application [REP9-027].</p> <p>To provide some element of clarity, the Peak District National Park Authority's reference to the requirement for "great weight" is taken from Paragraph 176 of the National Planning Policy Framework (2021); rather than in relation to Section 62 of the Environment Act (1995) / Section 11 of the National Parks and Access to the Countryside Act (1949); and in regard to the Sandford principle.</p> <p>Paragraph 176 of the National Planning Policy Framework (2021) states that: -</p> <p><i>"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural</i></p>	National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.

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			<p><i>Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas is to be given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park"</i></p> <p>The Peak District National Park Authority believes that the NPPF is relevant to this application and that therefore, 'great weight' should be accorded to the National Park.</p> <p>The applicant states that Section 62 of the Environment Act (1995) is wrongly quoted by the National Park Authority [REP9-027]. We disagree, the Section 62 Duty to have regard to National Park purposes applies to National Highways and their agents.</p> <p>It should be noted that the Memorandum of Understanding between Highways England and National Parks England states: -</p> <p><i>"Highways England has a statutory duty under Section 62 of the Environment Act (1995) to have regard to National Park purposes when carrying out work affecting land within a National Park and its setting. This duty also applies to any agents acting on behalf of Highways England"</i></p> <p>The wording of this Memorandum of understanding was authored and agreed by representatives of both Highways England and National Parks England.</p> <p>In proposing a scheme whose indirect effects are predicted to worsen conditions for sensitive receptors, without</p>	



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			<p>proposing associated mitigation or enhancement, we believe that applicant is falling short of this duty.</p> <p>9.79.10 – As described above, the reference to “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks” comes from Paragraph 176 of the National Planning Policy Framework (2021) rather than in reference to the Sandford principle.</p> <p>We believe that the NPPF is relevant to this application and that therefore, ‘great weight’ should be accorded to the National Park.</p>	
9.88.16	4.4	Apart from the issues covered elsewhere in these third written questions, please could Natural England, Peak District National Park Authority, Derbyshire County Council, and High Peak Borough Council summarise any remaining concerns that they have about the Applicant's consideration of the Peak District National Park?	<p>As stated throughout this Examination, the Peak District National Park Authority's principle concern rests on the indirect effects of the proposed scheme on the Peak District National Park and its Special Qualities.</p> <p>Fundamentally, we do not believe that these impacts have been adequately assessed or understood by the applicant or agents acting on their behalf. With regard to the sensitivity of the landscape and its receptors, the change in consultants mid-way through the scheme development halted what appeared to be a constructive dialogue on how best to approach this assessment. Engagement with the subsequent consultants proved less so in this matter, with a more rigid and less helpful approach being adopted.</p> <p>Unfortunately, this has left the National Park Authority with concerns about the assessment of the indirect impacts of the scheme on sensitive landscape receptors.</p>	National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is ‘not agreed’.
	6.	<b>Other noise, vibration, and nuisance</b>		
9.88.17	6.2	Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, and the Environment Agency summarise any remaining concerns that they have about the Applicant's consideration of noise, vibration, common law nuisance or statutory nuisance?	As expressed within our previous representations, the Peak District National Park Authority is concerned about the indirect impact of increased traffic flow on the peace and tranquillity of the National Park; and the quiet enjoyment of its Special Qualities. We have no further concerns that have not been expressed previously.	National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is ‘not agreed’.

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	<b>7.</b>	<b>Air quality</b>		
9.88.18	7.2	Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of air quality?	In our previous representations, the Peak District National Park Authority has expressed concerns about the impact of the scheme on the Tintwistle AQMA and through the deposition of NOx on the SAC. We have nothing additional to add to our previous comments.	National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.
	<b>8.</b>	<b>Climate change</b>		
9.88.19	8.2	Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, and Peak District National Park Authority summarise any remaining concerns that they have about the Applicant's consideration of climate change?	In our previous representations, the Peak District National Park Authority has expressed concerns about the impact of the scheme on Climate Change. We have nothing additional to add to our previous comments.	National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.
	<b>9.</b>	<b>The historic environment</b>		
9.88.20	9.1	<p>The Applicant [REP9-027] considers that there would be no perceptible change to the character, appearance or noise environment of the conservation area due to the very slight increase in traffic/ key attributes of setting which contribute towards significance would be persevered.</p> <p>Peak District National Park Authority [REP8-026] have remaining concerns about indirect effects on Tintwistle Conservation Area.</p> <p>Please could the Applicant and Peak District National Park Authority seek to agree on the assessment, any necessary mitigation, and how it is secured, and each provide a coordinated response?</p>	<p>The Peak District National Park Authority submitted comments to National Highways on 03 May 2022 to be included in the Statement of Common Ground (SoCG) on this matter. In summary, our comments stated that we have concerns that the language of the EIA impact assessment does not tie in completely with the language of the NPPF (and new terminology</p> <p>was introduced. i.e. 'minimal harm' which should be the lower end of 'less than substantial harm'), and that this is linked to their wider concerns that relate to the methodology for assessing tranquillity is flawed. The Applicant maintains that their approach to assessing the conservation areas is in accordance with DMRB LA 106, which is industry best practice and the assessment approach is proportionate, appropriate and consistent with the assessments undertaken for comparable highways DCO applications. With this in</p>	National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.

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			mind, it is not possible for the Peak District National Park Authority and National Highways to reach agreement on the assessment, and in the SoCG this issue is 'not agreed'.	
	<b>12.</b>	<b>Biodiversity, ecological and geological conservation, Habitat Regulation Assessment</b>		
9.88.21	12.9	<p>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, Natural England, and the Environment Agency summarise any remaining concerns that they have about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?</p>	<p>The Peak District National Park Authority has raised a number of concerns throughout the Examination in relation to biodiversity, ecological and geological conservation, Habitat Regulation Assessment. These concerns have included those related to air quality impact on Blanket Bog, noise and visual disturbance to birds, Mountain Hare roadkill.</p> <p>The above items remain of concern to the National Park Authority; however, we do not have any additional concerns.</p>	<p>National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.</p>
	<b>14.</b>	<b>Other environmental topics</b>		
9.88.22	14.1	<p>Apart from the issues covered elsewhere in these third written questions, please could Tameside Metropolitan Borough Council, Derbyshire County Council, High Peak Borough Council, Peak District National Park Authority, the Environment Agency, Natural England, and Statutory Undertakers summarise any remaining concerns that they have about the Applicant's consideration of:</p> <ul style="list-style-type: none"> <li>the utility infrastructure</li> <li>transboundary effects</li> <li>security</li> <li>major accidents and disasters</li> <li>civil and military aviation and defence</li> <li>decommissioning</li> <li>cumulative and combined effects</li> </ul> <p>other important and relevant considerations</p>	<p>As stated elsewhere, the Peak District National Park Authority's primary concern remains the indirect impact of the scheme (through increased traffic flows) on the National Park. Whilst indirect, these effects are largely negative, worsening conditions across a range of receptors; principally along the A628(T) and A57 Snake Pass corridors. Each impact has been assessed by the applicant as being minor or negligible. However, we do not believe that the sensitivity of receptors within the National Park has been robustly assessed. We are also mindful that these indirect effects impact the special qualities of the National Park at a range of different levels.</p> <p>For example, the A57 Snake Pass will experience a perceptible change in traffic noise, an increase in emissions including NOx, greater visual disturbance, greater severance. All of these impacts are to sensitive receptors. In combination, they are likely to affect the designated sites and their wildlife, as well as negatively affecting the quiet enjoyment of the National Park's residents and visitors.</p> <p>The Special Qualities of National Parks are given extremely high levels of protection by UK Law to prevent those qualities being adversely affected by development. We believe that in</p>	<p>National Highways agrees that the response provided here is an accurate reflection of comments that have already been received by the Peak District National Park Authority, and that these comments are included in the final Statement of Common Ground, submitted at Deadline 12 (TR010034/EXAM/9.13(2)), where National Highways has provided responses and the status of the issue is 'not agreed'.</p>

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			<p>this case, the proposed scheme will damage those qualities. Therefore, we would wish to see either changes to the scheme to address this; or measures introduced to mitigate damage to or enhance the Special Qualities of the National Park.</p> <p>For clarity, the Special Qualities differ between the different National Parks. In the case of the Peak District National Park, these are defined within the Peak District National Park National Park Management Plan (2018-23)<sup>2</sup>. These special qualities are: -</p> <ul style="list-style-type: none"><li>• Special quality 1: Beautiful views created by contrasting landscapes and dramatic geology;</li><li>• Special quality 2: Internationally important and locally distinctive wildlife and habitats;</li><li>• Special quality 3: Undeveloped places of tranquillity and dark night skies within reach of millions;</li><li>• Special quality 4: Landscapes that tell a story of thousands of years of people, farming and industry;</li><li>• Special quality 5: Characteristic settlements with strong communities and traditions;</li><li>• Special quality 6: An inspiring space for escape, adventure, discovery and quiet reflection; and</li><li>• Special quality 7: Vital benefits for millions of people that flow beyond the landscape boundary.</li></ul> <p>The geographical area that is negatively affected by the indirect impacts of the scheme encompasses all of the above Special Qualities to a greater or lesser extent. We would suggest that Special Qualities 1, 2, 3 and 6 are of particular relevance in relation to this and earlier representations made by the Peak District National Park Authority.</p>	

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			<p>We would suggest that it is incumbent on the Applicant to demonstrate how they have had regard to National Park purposes and the benefits and impacts of the scheme on the National Park's Special Qualities. We would also request that the Applicant demonstrate how the effects of the scheme on those Special Qualities have been determined and measured.</p> <p>As stated previously, there may be measures that could provide mitigation of negative impacts or enhance the Special Qualities of the National Park. However, this is dependent on a full understanding of what the impacts are and what measures may be available. Any such measures would need to be agreed with the Peak District National Park Authority</p> <p>The Peak District National Park Authority remains open to dialogue with the Applicant in order to address this issue.</p>	



## 7. REP11-018 Stephen Bagshaw - Responses to the Examining Authority's Third Written Questions

Reference	IP Issue	NH Response
9.88.23	<p>My deadline 8 submission [REP8-042] discussed the merits of the MGF as an alternative to the proposed A57 Links Road, whilst fully responding to the rather weak doubts and objections raised to it by NH. It is very apparent that it has a very good pedigree, having been named as Alternative One at the Mottram Tintwistle Bypass Inquiry in 2007 and scoring highly in terms of efficacy and environmental benefits.</p> <p>The submission proceeded to examine whether the MGF had been considered by decision makers as an alternative solution to the major roadbuilding options.</p> <ul style="list-style-type: none"> <li>It looked at whether the scheme as proposed by myself had been considered by NH in their Application documents of 2021 such as the 6.2 Environmental Statement Non-Technical Summary dated June 2021 (pages 15-16) and I found no reference to it there.</li> <li>It also looked at whether the scheme, as I proposed it, was considered in the Trans-Pennine Feasibility Study of 2015, from which emerged the current Link Roads project (RIS1).</li> <li>The MGF, as I intended it, was initially described within NH's Environmental Statement (REP2- 005) at page 100 Table 3.3 (23 Options assessed at the initial sift) as the 'best performing individual option against the sifting criteria and for meeting the objectives for the Scheme'. It was also described as deliverable and feasible.</li> <li>Then, curiously, at this point in the procedure (Appendix 2, the Stage 2 Report of this same study [Annexes – Annex 1], para 5.9) it was decided to assess the MGF not as a standalone scheme nor in conjunction with other sustainable measures (as HA were prepared to do in 2008) but in conjunction with a package of measures which included first and foremost 'a link road between the A57 (T) and the A57 in Glossop'.</li> </ul> <p>I thus concluded and still maintain that the MGF has not been either assessed nor considered as an alternative solution to NH's more preferred major roadbuilding options.</p>	<p>The alternatives to the proposed Scheme considered by National Highways and the justification for their rejection are set out in Chapter 3 of the Environmental Statement (APP-060) and item 9.75.34 in Applicant's written Summary of Issue Specific Hearing 3 (REP8-019).</p>
9.88.24	<p>B. That an assessment, or if applicable, a reassessment, of the scheme I propose, to now take place on the grounds of the Stonehenge case as cited by CPRE [REP 8-045] (R Save Stonehenge World Heritage Site Ltd v Secretary of State for Transport - Neutral Citation Number: [2021] EWHC 2161 (Admin) (the Stonehenge Case):</p> <p>Even if a full options appraisal has been carried out for the purposes of including it in the RIS there may be several reasons why further consideration of options is required. As outlined by the Stonehenge case judgement:</p> <ul style="list-style-type: none"> <li>(i) The options appraisal may not have involved all the considerations which are required to be taken into account under the development consent process.</li> <li>(ii) There may have been a change in circumstances since that exercise was carried out.</li> <li>(iii) The options testing for a RIS may rely upon a judgement by National Highways which undermines reliance upon that exercise and NPSNN 4.27.</li> </ul>	<p>Please see National Highways' response to Examining Authority Third Written Question 3.4 in the Applicant's responses to Examining Authority's Third Written Questions (ExQ3) (REP11-010).</p>

Reference	IP Issue	NH Response
	<ul style="list-style-type: none"> <li>(iv) Updating of the appraisal is expected.</li> </ul>	
9.88.25	<p>C. Similarly, within the CPRE submission [REP 2-069] the matter is raised of dramatically changed national circumstances since the Scheme's RIS1 Adoption:</p> <p>There have been far reaching changes in circumstances which took place since RIS2 was published and before, or during, the 2020 statutory consultation:</p> <ul style="list-style-type: none"> <li>Climate emergency declared May 2019 by UK Government.</li> <li>Climate Change Act 2008 amended in June 2019 to reach Net Zero emissions by 2050.</li> <li>Radical carbon emissions reduction targets set by all the local and regional authorities impacted by the scheme.</li> <li>Covid-19 pandemic (March 2020 and ongoing) which radically altered travelling patterns, and increased homeworking and virtual meetings for businesses.</li> <li>Review of Treasury Green Book, 25 November 2020, which provides the framework to evaluate the value of new infrastructure.</li> </ul> <p>Since then, radical national and regional targets to cut urban traffic and increase walking and cycling to 50% by 2030 in DfT's Decarbonising Transport and by 2040 in Greater Manchester's Right Mix policy, both published in 2021.</p>	<p>As set out in response to Applicant's comments on Deadline 8 submissions (REP9-027), item 9.79.50 National Highways maintains that the Scheme does not affect the UK's delivery of the Net Zero Strategy and will not have a material impact on the ability of Government to meet its legally binding carbon reduction targets, and therefore meets the requirements of the National Highways Licence. The Net Zero Strategy sets out target-compliant "indicative delivery pathways" for each sector until 2037. The indicative delivery pathway is designed according to "our current understanding of each sector's potential, and a whole system view of where abatement is most effective". It is a full cross-sector strategy that has implications for consumer behaviour around modal shift, which in turn is linked to incentives to encourage the use of cleaner transport modes. Policymakers need to facilitate incentive schemes to support the behavioural change required to reach the net-zero target, including regulations, pricing, subsidies and incentives (e.g. for electric vehicle purchase). There is still a need for 'fit-for-purpose' infrastructure that is designed with a sense of place, and encourages active travel, which is what the Scheme achieves. The Scheme also has a Carbon Management Strategy and associated Carbon Management Plan in place to cut carbon from the construction stage. In a statement released by Transport Secretary on 14 July 2021, when the Transport Decarbonisation Plan (TDP) was published, he explained that the new plan "is not about stopping people doing things: it's about doing the same things differently...We will still drive on improved roads, but increasingly in zero-emission cars". The TDP intends to cut traffic growth through other measures, such as those to improve walking and cycling infrastructure and behavioural changes to facilitate a modal shift. The Applicant's response to question 8.8 of the Examining Authority's Second Written Questions (REP6-017) provides examples of how the Scheme is aligned with this approach for the operational stage.</p> <p>In granting development consent for National Highways' M54 to M6 Link Road scheme on 21 April 2022, paragraph 35 of the Decision Letter states: "<i>The Secretary of State notes that the scheme will result in an increase in carbon emissions but that the view reached by the ExA is that it will not be so significant that it would materially impact on the ability of Government to meet its carbon reduction targets (ER 15.3.11). The Secretary of State does not consider that net zero means consent cannot be granted for development that will increase carbon emissions. The Secretary of State considers that, as set out in paragraph 5.18 of the NPSNN, it is necessary to continue to evaluate whether (amongst other things) the increase in carbon emissions resulting from the Proposed Development would have a material impact on the ability of Government to meet its carbon reduction targets.</i>" Similar statements are made in paragraph 113 of the M25 Junction 10/A3 Wisley Interchange and paragraph 92 of the M25 junction 28 improvements decision letters.</p> <p>The Applicant considers this to be relevant the Scheme is comparable to the M54 to M6 Link Road (and the M25 Junction 10/A3 Wisley Interchange and the M25 junction 28 improvements Schemes) as its contribution will not have a material impact on the ability of Government to meet its legally binding carbon reduction targets.</p> <p>With regards to 'The Right Mix', as set out in Applicant's written Summary of Issue Specific Hearing 3 (REP8-019), item 9.75.12, it is important to record that the "Right Mix" vision within the Strategy, sets out how modal trips are to be allocated using spatial themes, to secure an overall vision of 50% of trips to be made by sustainable modes. In relation to City-to-City trips, the Strategy acknowledges that active travel is not a realistic alternative and is targeting a 5%</p>

Reference	IP Issue	NH Response
		<p>reduction in car mode share (page 84) from 87% currently to 82% by 2040. The data supporting the Right Mix vision is presented in the Technical Note, which is appended to the Strategy and relevant extracts relating to City-to-City trips are provided below.</p> <p>Moreover, the Greater Manchester Five Year Transport Delivery Plan 2021-2026 (2021) states “<i>Greater Manchester’s network of motorways and trunk roads (forming part of the national Strategic Road Network) is managed by Highways England. Over the next five years, we will continue to work with Highways England to tackle congestion and deliver improvements to the network...</i>” (paragraph 167). It also states “Trans-Pennine Road Connections: Highways England will shortly be delivering the Mottram Moor and A57(T) to A57 Link Roads, as part of a package to improve Trans Pennine road connectivity between Greater Manchester and South Yorkshire” (paragraph 170).</p> <p>Additionally The Greater Manchester Five Year Transport Delivery Plan 2021-2026 ‘Appendix A: List of Interventions’ contains a table headed “<i>In the next five years, we are committed to delivering...</i>”. On page 85 this table identifies Mottram Moor and A57(T) to A57 Link Roads as an intervention that TfGM is committed to delivering, and gives the rationale as follows “<i>As part of the wider Trans-Pennine Upgrade, to reduce journey times and improve reliability between the Greater Manchester and Sheffield City-Regions, reduce traffic impacts on local communities and improve safety</i>”.</p> <p>As set out in response to Applicant's comments on Deadline 8 submissions (REP9-027), item 9.79.30, with regards to buses, National Highways’ aim is to maintain all the existing bus routes on existing roads as they already provide services to the areas within the Scheme area. The proposed new carriageways are not expected to be used by any services as the aim of the new roads is to provide alleviation of traffic congestion along the existing routes. Less traffic along the sections of the A57 Hyde Road, and Woolley Lane will benefit bus reliability and speed, the details of stop provisions will be undertaken further with TfGM and DCC as part of detailed design, particularly as there are proposed changes to operation of the bus routes and infrastructure with TfGM taking greater ownership of this process.</p>
9.88.26	<p>D. Furthermore, RIS1 2015-2020 para 2.12 states that there is an expectation for ‘the appraisal of schemes to be updated:</p> <p>‘The appraisal for these schemes will continue to be updated as the schemes develop. It is possible that some of these major schemes will as a result of further analysis of the economic, strategic and delivery cases be found to not be justified. In which case they would not be pursued and Highways England would have to explore other means of tackling the identified problems.’</p> <p>This applies to the current scheme. The Treasury updated its Green Book in November 2020 which gave the Applicant plenty of time for a review of the strategic case but it has still not been updated.</p> <p>Consequently, I contest that the MGF, either as proposed, or coupled with sustainable transport measures was never fully tested by Highways England in 2015 nor has it been since.</p> <p>Individual elements that compared favourably with NH’s chosen scheme were rejected prematurely and the MGF was one of those. I request therefore, on that further basis, a full</p>	<p>Please see National Highways’ response to Examining Authority Third Written Question 3.4 in the Applicant's responses to Examining Authority's Third Written Questions (ExQ3) (REP11-010).</p>

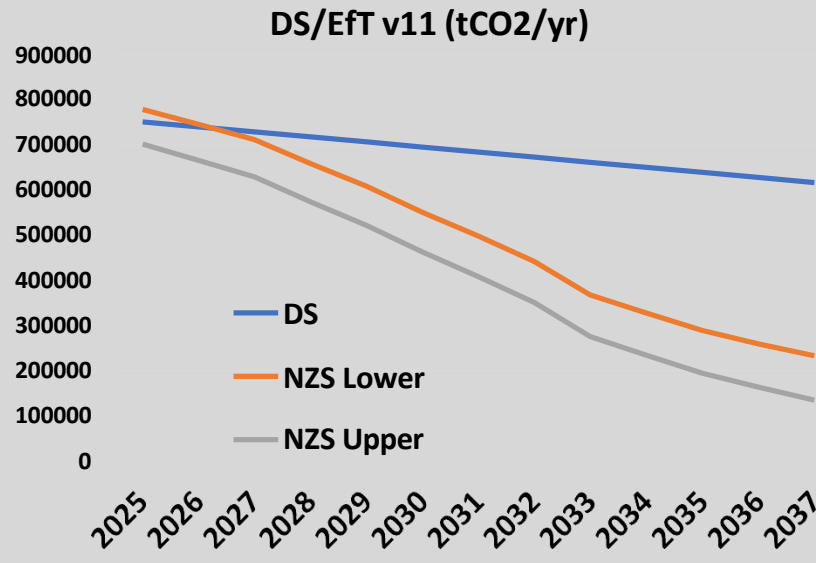
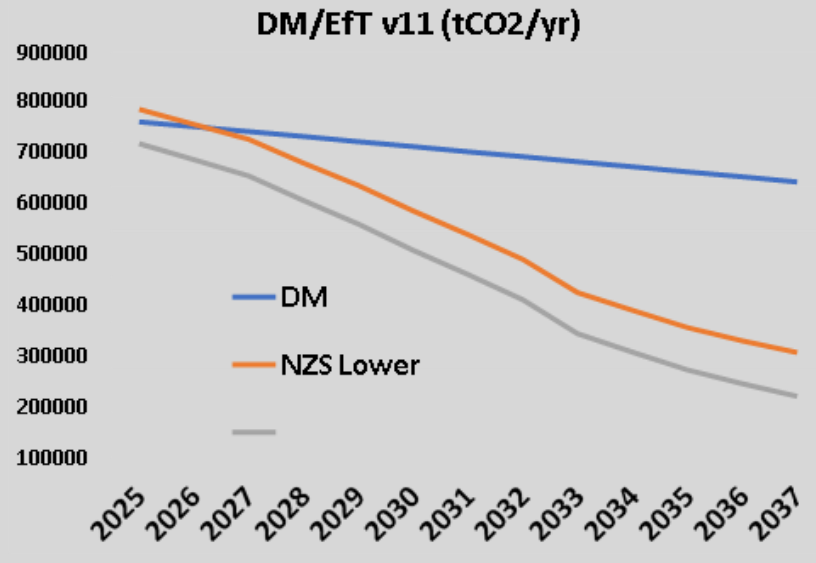
Reference	IP Issue	NH Response
	assessment of the MGF as proposed; and/or with non-roadbuilding sustainable transport measures, as previously discussed.	

## 8. REP11-020 Climate Emergency Policy and Planning (CEPP) - Response to Applicants Submission at Deadline 10

Reference	IP Issue	NH Response
9.88.27	<p>1 INTRODUCTION</p> <p>1.1 Deadline 11 (D11)</p> <p>1. This is my submission for Deadline 11 which responds to “9.84 Applicant's Comments on Deadline 9 Submissions [REP10-010].</p> <p>2. The applicant relies upon the recent decision letter by the SoS on M54-M6 scheme (decision letter referred to here as M54-M6-DL) and draws comparisons to the A57 scheme. Therefore, it is necessary to comment on that decision. I previously made some initial comments on the M54-M6-DL at Deadline 10 [A57/REP10-011].</p> <p>I extend the analysis here. I apologise for some repetition, but consider it is helpful to lay out matters in full. However, to ease this, I have summarised the arguments in section 2 and provide an Appendix with more detail. Section 2 hopefully provides a high-level list of the matters of concern with the M54-M6-DL.</p> <p>3. As background to commenting on M54-M6-DL, I previously provided in A57/REP10-011 background on the current legal challenge to the Government, now with permission to proceed to a full Judicial Review hearing, against the Net Zero Strategy, and outlined a number of propositions which occur in the Applicant's submissions to the examination. I have summarised this issue in the next bullet.</p> <p>4. The applicant relies upon the contention that because various national climate change policy documents and targets exist, it is guaranteed that the Government will meet its carbon reduction targets and targets set within them, and consequentially, the scheme will not have a material impact on the ability of the Government to meet its carbon reduction targets. This proposition is false on both counts (ie the general principle and its specific application to the scheme), although it is widely applied by the applicant, including with reference to the Net Zero Strategy (NZS), the Transport Decarbonisation Plan (TDP) and the UK's National Determined Contribution (NDC) and international obligation under the Paris Agreement. The applicant's statements with respect to the significance of the carbon emissions associated with the scheme and their material impacts on meeting Government's carbon reduction targets relating to NN NPS 5.17 and 5.18 need to be re-examined in the context of this falsehood</p>	<p>National Highways respectfully suggests it would be premature to comment on the legal challenge that the IP refers to before it has been determined.</p> <p>It is also noted that several issues raised have either been raised and responded to previously and/or have been raised in the letter 'TR010034 – A57 Link Roads Deadline 10 Letter To ExA' (REP10-017). National Highways responded to this letter on 13 May 2022 (AS-011) and the Climate Emergency Policy and Planning Deadline 10 submission (REP10-011), so will not repeat any comments within this submission.</p> <p>National Highways will therefore only respond to comments from REP11-020 that relate to points that have not previously been raised or commented on in previous submissions.</p>
9.88.28	<p>1.2 Timings in the late stages of the examination</p> <p>5. I noted at A57/REP10-011/6.1 that the applicant, in REP9-029 (and the remainder of their previous evidence), is in denial about there being no cumulative carbon assessment in the Environmental Statement.</p> <p>6. I highlight the same below in the applicant's response in REP10-010.</p> <p>7. I note the ExA's WQ3/8.1 requests “a detailed response to the climate change matters raised” by myself and several IPs. I hope that this will be forthcoming.</p> <p>8. However, if the applicant's response does not address the issues with full engagement to structured and in-depth arguments from myself and other parties, then I can only conclude that the applicant cannot answer the points.</p>	<p>Please refer to National Highways response to 'TR010034 – A57 Link Roads Deadline 10 Letter to ExA' (AS-011).</p>



Reference	IP Issue	NH Response
	9 Further should a last-minute response be provided at Deadline 12, on the close of the examination, then such an approach would be prejudicial to myself and IPs who would be precluded a chance to comment on such a submission.	
9.88.29	<p>3.4 National_Highways/REP10-010/7.4.4 – IEMA guidance</p> <p>27 I have previously laid how the applicant selectively quotes the IEMA guidance. This is another case in point.</p> <p>28 The applicant claims that the scenarios used in its assessment of carbon aligns with IEMA guidance page 31 “What should be included when reporting on GHG emissions within an ES chapter”. This page lists five steps including “net emissions” and “significance”.</p> <p>29 Page 21 of the guidance has a section on “Cumulative GHG emissions”, and “Net emissions” on page 31 has to be understood in that context. For example, page 21 says “Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other”. Individual, or solus, is precisely what the applicant has done, and is only what it is has done [A57/REP8-029/section 7].</p> <p>30 Page 21 also states “Where the contextualisation is geographically – or sector-bounded (e.g. involves contextualising emissions within a local authority scale carbon budget, or a sector level net zero carbon roadmap), then the consideration of cumulative contributions to that context will be within that boundary.” The applicant has constructed a traffic model where the cumulative presence of land-based and road developments is represented within the study area ‘boundary’ (this is not disputed, A57/REP8-029/49); however, it has quantified or assessed the cumulative impacts on greenhouse gas emissions of these traffic model elements (A57/REP8-029/section 7). The applicant has not followed IEMA guidance, nor EIA guidance, on cumulative assessment of carbon emissions.</p> <p>31 On “significance”, at Appendix A/5.5, that the concept of “significance” can only be understood in terms of securing the delivery of the NZS, TDP and NDC. We are near to the limit of carbon emissions which may be generated (the “remaining global carbon budget” in the scientific jargon), as the IEMA guidance states. Every gram of CO2 emitted is significant. However, the significance becomes very great in the current situation of an absence of a clear and demonstrated route to securing delivery of policy for net-zero. That is the case now, as evidenced by the legal action against the NZS.</p> <p>32 I contest the idea that the application is in line with the IEMA guidance page 31 “What should be included when reporting on GHG emissions within an ES chapter”, and especially for the bullets on page 31 for “net emissions” and “significance”.</p>	<p>Please refer to National Highways response to ‘TR010034 – A57 Link Roads Deadline 10 Letter to ExA’ (AS-011) and National Highways response to the Climate Emergency Policy and Planning Deadline 10 submission (REP10-011).</p>
9.88.30	<p>3.5 National_Highways/REP10-010/7.4.5 – graphical representations of emissions reductions</p> <p>33 The provision by the applicant of year-on-year carbon emissions quantities for the 60-year appraisal period for the DS and DM models, when run with Eft v11, at REP9-027 Appendix A, is helpful. It is now possible to draw the graphs that I had intended at D9, and these are shown below.</p>	<p>As set out in REP10-010 paragraph 7.4.6, the Eft v11 carbon emissions with the Scheme (DS) and without (DM) the Scheme [shown as the blue lines in the graphs produced by the IP in REP11-020] would not be expected to align with the NZS delivery pathway. As stated in the assumptions of the carbon emissions assessment set out in REP8-018 Appendix A, the assumptions on uptake rates of electric vehicles in EFT v11 predate announcements by the Government in 2021 on plans to increase the speed of electric vehicle uptake and do not take account of the TDP. The EFTv11 carbon emissions can therefore be considered to be conservative.</p>

Reference	IP Issue	NH Response
	<p>34 This is based as before on the assumption that the traffic model study area represents a proxy for a notional local and regional area<sup>1</sup>. For an indicative sense of this approach, the graphs below are presented with assumptions in the footnotes</p> <div><p><b>DS/EfT v11 (tCO<sub>2</sub>/yr)</b></p><p><b>DM/EfT v11 (tCO<sub>2</sub>/yr)</b></p></div> <p>35 The first observation is that neither of these views of the EfT v11 traffic model (ie DS or DM) remotely aligns with the NZS delivery pathway for the transport sector. The applicant's</p> <p>This essentially provides scaled projections for the data (DS or DM) and the NZS calculated on the basis of the study area as a local/regional area, normalised to 2025.</p> <p>response to this has been to multiply the data by an idealised factor, each year, to make the curve fit (see my response above on the so called TDP Sensitivity test, and the applicant's response at REP9-027/8.14.3/4). As above, this is just the numerical application of proposition 3 [A57/REP10-011/9]: the "overarching assertion of TDP success" to the data: it aligns more with</p>	<p>The assumptions in EFT v11:</p> <ul style="list-style-type: none"><li>• Predate the announcement by the Government in July 2021 to end the sale of new petrol and diesel vehicles by 2030, and that all new cars and vans will be required to be fully zero emission at the tailpipe by 2035. Assumptions within EFT v11 are for a phase out of sales of new petrol and diesel vehicles by the target date of 2040.</li><li>• Predate the announcement by the Government in November 2021 to phase out new, non-zero emission heavy goods vehicles weighing 26 tonnes and under by 2035, with all new HGVs sold in the UK to be zero emission by 2040. Assumptions within EFT v11 do not include any electrification of heavy goods vehicles.</li></ul>

Reference	IP Issue	NH Response
	<p>a mystical belief than with any evidence that it can be delivered.</p> <p>The first DS/EfT v11 graph above (blue curve = DS) indicates that transport carbon emissions in the study area will not reduce to 2037 in line with the NZS. In fact, they are very misaligned with the NZS. Where TDP policies are successful, the blue line will move towards the orange and grey upper/lower NZS lines, but as there is no carbon quantification of TDP policies, nor data supporting that they are designed to secure their emission reduction objectives, it is impossible to make any claim about how much the blue will move towards the orange and grey lines.</p> <p>36 The second observation is that this is true also for the DM/EfT v11 graph above (blue curve = DM). This indicates that transport carbon emissions in the study area will not reduce to 2037 in line with the NZS without the scheme either.</p> <p>37 Together these observations, indicate that only a sustainable package implemented without the current scheme in place ('do-something-else'), that is designed to secure the required policy objectives, would have the potential to provide the required policy delivery mechanisms as I, and other IPs, suggest in the joint letter at A57/REP10-017.</p>	
9.88.31	<p>3.6 National_Highways/REP10-010/7.4.6 – electrification</p> <p>38 Whilst electrification may not be fully represented in EfT v11, the applicant again implies that they can fit the NZS trajectory by the application of the TDP factors to the data. As stated above, in doing this they are relying of proposition 3 that the TDP will inevitably be fully delivered: however, no evidence has been provided to support this proposition, and the NZS is being legally challenged on the same point (proposition 1).</p>	It is yet to be seen whether the UK Government's NZS and TDP can ensure carbon emissions are sufficiently reduced to the extent that budgets and targets are achieved, but there is an expectation that the NZS and TDP will result in carbon emissions falling in the future.
9.88.32	<p>3.7 National_Highways/REP10-010/7.4.7 – electrification</p> <p>39 The comments at the previous bullet apply to the first sentence. On the second sentence, the year-on-year reduction in absolute carbon emissions is plotted above in the DS/EfT v11 graph above (blue curve = DS). This suggests that increasing electrification only outweighs carbon emission increases due to traffic growth between 2025 and 2040 very slightly. The applicant acknowledges carbon emissions increases due to traffic growth, but the DS data provided is nowhere close to NZS alignment. I have discussed above, to fit a NZS trajectory, the applicant has to rely on proposition 3 that the TDP will inevitably be fully delivered, and no evidence has been provided to support this proposition.</p>	<p>Please refer to the response given in the response to 33-37 and 38 above.</p> <p>With regard to increasing electrification outweighing carbon emission increases due to traffic growth between 2025 and 2040. Based on the year by year carbon emissions (REP9-027, with the Scheme the carbon emission reduction between 2025 (opening year) and 2040 (year 16) is 168,134 tonnes CO2e which is a 22% reduction compared to the 2025 emission with the Scheme. This is not considered to be a very slight reduction.</p>
9.88.33	<p>3.8 National_Highways/REP10-010 - cumulative assessment not addressed</p> <p>40 A general point on the applicant's response is that they have not yet addressed bullets 47-96 of A57/REP8-029. This was noted at A57/REP10-011/6.1. I note here that the crux of the matter as to whether the environmental statement includes a quantification and assessment of the cumulative carbon emissions of the scheme which is compliant with the EIA Regulations has still not been addressed by the applicant in REP10-010 either.</p>	Please refer to National Highways response to 'TR010034 – A57 Link Roads Deadline 10 Letter to ExA' (AS-011) and National Highways response to the Climate Emergency Policy and Planning Deadline 10 submission (REP10-011).
9.88.34	<p>4 CONCLUSIONS</p> <p>41 Even at this late stage, the applicant has not provided a cumulative carbon assessment</p>	National Highways disagrees with the conclusions of Climate Emergency Policy and Planning for the reasons states in its previous representations to Climate Emergency Policy and Planning and has no further comment to add.

Reference	IP Issue	NH Response
	which is compliant with the EIA Regulations.	
	42 The absolute emissions from the scheme either as DS or DM do not comply with the NZS trajectory.	
	43 No attempt to comply with the IEMA guidance in assessing carbon emissions over the local/regional level, and against local policy has been made.	
	44 The Environmental Statement is inadequate, and the SoST cannot be satisfied that the material provided by the Applicant is sufficient for him to reach a reasoned conclusion on the significant effects of the proposed development on the environment, and that it meets legal, guidance and policy requirements.	
	45 The application should not be consented.	

## 9. REP11-022 CPRE Peak District and South Yorkshire - Response to Applicants Submission at Deadline 10

Reference	IP Issue	NH Response
9.88.35	<p>Forecasts and BCRs</p> <p>NH say that a BCR test using high carbon cost and low traffic (and vice versa) are “highly unlikely scenarios” and “a fraction of a fraction of a probability of occurrence.” This is simply wrong – a situation where climate change is causing problems to the world economy sooner than expected is exactly one where the cost of reducing carbon would be high, due to the additional quantities which would have to be avoided. The marginal cost of reducing carbon emissions is lowest for the easiest measures (sometimes called “low hanging fruit”). As more and more carbon reductions are required, the cost rises. In the case where reductions are not enough the idea of carbon capture may come into play, where costs are significantly higher (if it can be made to work). This is pretty much accepted by most economists and it is surprising that NH don’t understand this point at all. High carbon reduction cost and climate change damage to growth is clearly possible and some would say likely. It should be noted that the low growth and high carbon cost figures are actually within fairly narrow bands and assume reasonable success in tackling climate change.</p> <p>However, there is a bigger point which NH also seem to be avoiding. Scenario forecasting and dealing with uncertainty was already recognised by DfT and used to guide their national forecasts since 2015. This has been in relation to factors such as how much people travel, whether the economy grows, and how much fuel costs. Different combinations are tested to explore uncertainty in a meaningful way. This is very well put in the Road Traffic Forecasts 2018 as follows:</p> <p>“4 Understanding future demand for road travel is essential to shape the policies we implement and the investments we make. However, forecasting future demand is complex and there is significant uncertainty about the extent to which existing trends and relationships will carry on into the future. We need to ensure that we understand and communicate this uncertainty.</p> <p>5. Within these forecasts, a scenarios approach has been taken to construct a number of different plausible future outcomes. This provides a strategic view of key uncertainties that might impact on future road traffic and supports the design of strategies and policies that are resilient to these uncertainties.</p> <p>6 These forecasts are not definitive predictions about the future, or desired futures, but show how demand for road travel may evolve assuming no change in government policy beyond that already announced. These forecasts have been produced using a broad range of research, evidence and data focusing on:</p> <ul style="list-style-type: none"> <li>• Our understanding of how people make travel choices</li> <li>• The possible paths of key drivers of travel demand”</li> </ul> <p>One of our key arguments has been that uncertainty is even more important than in 2018 and the certainty of the impact of climate change makes scenarios in which it plays a major part even more important.</p>	<p>The scenarios which have been presented by National Highways as sensitivity tests are consistent with guidance set out by Department for Transport (DfT) Transport Analysis guidance (TAG).</p> <p>The low and high carbon price sensitivity tests are informed by TAG A3 section 4, using unit prices provided. These units represent the price of a tonne of CO<sub>2</sub>e with the central, low and high values all developed by the Department for Business, Energy &amp; Industrial Strategy (BEIS) and adopted by TAG in July 2021.</p> <p>The other sensitivity test provides a variation in trip growth relative to the base year, considering variations in national traffic growth. This reflects levels of uncertainty in DfT’s National Transport Model. The guidelines for determining these high and low growth scenarios have been adhered to and are set out in TAG M4 section 4.</p> <p>These sensitivity tests have been provided to indicate levels of uncertainty in the forecast impacts of the scheme in line with DfT guidance and their use is consistent with the application of sensitivity testing used for the M25 Junction 10/A3 Wisley Interchange scheme which has recently been approved by the Secretary of State.</p> <p>Further scenario testing, as set out in DfT’s Uncertainty Toolkit, is not yet possible as it would be dependent on datasets which DfT are yet to release.</p> <p>It should be noted that the high/low growth traffic scenarios are not normally carried out for the environmental aspects for highways schemes. National Highways maintain that this approach is appropriate and proportionate for decision making purposes, is industry standard, and is consistent with their other DCO schemes (for example, the M25 Junction 10 scheme).</p> <p>Furthermore, it should be noted that the high/low traffic growth scenarios reflect only variations in local levels of traffic and are not representative of global factors driving traffic trends.</p>
9.88.36	<p>2. Where are the costs and benefits?</p> <p>On the issue of where the costs and benefits of the scheme really occur, this is a major area where there is still a lack of clarity and sometimes basic information. This makes production of an SoCG on this area very difficult.</p>	<p>The mention of Denton and Hyde in the Applicant's Comments on Deadline 9 Responses (REP10-010), paragraph 10.2.6, clearly stated that these areas were included in the most detailed area of modelling. The implications that CPRE is drawing with respect to these locations are in direct contradiction to this fact. It is agreed that these areas are likely to be</p>



Reference	IP Issue	NH Response
	<p>The first question is on fixed costs. Without discussing “perturbation assignment” in SATURN modelling which NH refer to, there needs to be some clarity on this.</p> <p>First it appears that NH are claiming that traffic in Central and Western Manchester is hardly affected by the scheme. They mention Denton and Hyde (para 10.2.6). The NH figures in the original TA show a 26-27% increase in the flows on the M67 caused by the scheme.</p> <p>This passes through Denton and is highly relevant to journeys starting or finishing in Denton and Hyde, the two places NH claims would be unaffected. The modelling does not include the delays caused by increased flows in the fixed cost area. This is clear where NH say</p> <p>“The term “fixed” relates to the flow-delay function for each turn at each simulated junction.” What this means is that if traffic increases at one of these junctions in the fixed cost area it does not impose the extra congestion costs on the traffic passing through it which would be imposed in the Area of Detailed Modelling. Masking also has the effect of removing some cost changes. The overall impact was shown in our earlier submission but this has the effect, for example, of producing zero change in costs for trips within Central, Northern and Western Manchester. This is simply not credible.</p> <p>The second point is that NH do not use alternative figures in this section to rebut the CPRE calculations. It is accepted that these are not perfect because the matrices lack some detail. For NH to criticise CPRE because they did not supply CPRE with sufficiently detailed data is somewhat galling considering that some data is outstanding from our requests dating back to March 2021.</p> <p>However, NH have supplied some estimates of their own (again with no details). For example, in REP5-022 para 9.64.54, NH say</p> <p>“Of the total travel time benefits delivered by the Scheme, approximately 6% comes from trips between Manchester and Sheffield. A further 10% comes from trips which start or end in Manchester or Sheffield with the other end of the trip in the corridor between them. The bulk of the remaining benefits are for more local journeys in the vicinity of the Scheme”</p> <p>This appears very similar to the CPRE trip data they are attempting to rebut in the new submission.</p> <p>Again in RE9-027, para 9.74.21 NH say</p> <p>“Based on a best fit using these sectors approximately 70-75% of benefits relate to trips to, from or within the Greater Manchester area, with 25-30% of the total benefit generated by trips entirely within Greater Manchester. However, due to the specification of these sectors, these figures include trips to and from Glossop, which is outside of Greater Manchester.”</p> <p>This seems very close to the calculations CPRE submitted at Deadline 4 and 5 and confirms the point that the majority of the scheme’s benefits to travel by road is in a conurbation subject to demand management policies and programmes with clearly predicted outcomes for traffic reduction. They thus undermine those outcomes by negating the effect of schemes to attract drivers from their cars. Our view is that the earlier figures reveal that NH have not and cannot deny that the majority of scheme benefits are in Greater Manchester.</p>	<p>considerably affected by the scheme, with congestion which will occur with the current network conditions relieved by the scheme and journey times between these locations and towns such as Glossop and Hadfield improved.</p> <p>National Highways has not stated that Central and Western Manchester as a whole do not generate significant levels of benefit from the scheme, as clearly these areas generate very large numbers of trips, some of which will pass through the scheme. A proportion of those will change route to do so and this will impact other trips not using the scheme at all. However, the impact on the trips not using the scheme is expected to be a very small change in cost of travel per trip, with some trips receiving a small benefit and some a small disbenefit.</p> <p>Even considering the areas outside of the area of detailed modelling the response in REP10-010 made very clear that if traffic increases at a junction as a result of the scheme, then delays at that junction will be represented by the model. Again, the claim made by CPRE is in contradiction to this fact.</p> <p>While masking has been applied to the economic benefits to minimise effects of model noise, the impact of this has been set out in REP10-010 showing it results in a very marginal reduction in the BCR of less than 1% for the scheme and does not therefore reduce validity. National Highways have not used alternative figures to rebut CPRE’s calculations with respect to accuracy of modelling. This is because, as previously stated in REP10-010, when the methodology applied by the fixed cost function is correctly considered, the exact value is of little relevance since the reduction in detail in the modelling is only very marginal. It is agreed that this would be important if the link and junction costs were fixed outside of the area of detailed modelling, but that is not the case.</p> <p>As the Applicant states, National Highways have already provided a view on the approximate distribution of benefits with relation to Greater Manchester (REP9-027 – reference 9.79.21). As set out in the Statement of Common Ground between Transport for Greater Manchester and National Highways (AS-010):</p> <p><i>“The A57 Link Roads scheme aligns with the Greater Manchester Transport Strategy 2040 (the “Strategy”) policy objectives and is expressly identified on page 92 as part of the suite of planned investment in Greater Manchester’s Strategic Road Network which is described as critical to the delivery of a more reliable northern highways network and forms part of the measures to deliver improved City-to-City highways connectivity.</i></p> <p><i>The Strategy identifies the Memorandum of Understanding signed between Highways England and Transport for Greater Manchester to establish a complimentary highways network and more closely integrate the operation of the Strategic Road and Key Route Networks and deal with existing and potential bottlenecks on key highway links.</i></p> <p><i>It is important to record that the “Right Mix” vision within the Strategy, sets out how modal trips are to be allocated using spatial themes, to secure an overall vision of 50% of trips to be made by sustainable modes. In relation to City-to-City trips, the Strategy acknowledges that active travel is not a realistic alternative and is targeting a 5% reduction in car mode share (page 84) from 87% currently to 82% by 2040. The Scheme will provide new and improved facilities for pedestrians, cyclists and horse riders throughout the route, including:</i></p> <ul style="list-style-type: none"> <li><i>• Improved pedestrian and cyclist crossing facilities at the M67 junction 4, and all new junctions created by the scheme</i></li> <li><i>• Crossing at the Mottram Moor junction will be quicker and easier with the new crossroads design.</i></li> </ul> <p><i>The scheme is also adding more cycling and pedestrian crossings The Scheme incorporates proposals for traffic calming on the sections of the A57 bypassed by the Scheme as mitigation and encouraging local trips by sustainable modes of transport. The Scheme does not preclude</i></p>



Reference	IP Issue	NH Response
		<i>the future introduction of improved public transport services that would contribute to Right Mix and the GMTS 2040 policy and that by reducing traffic congestion, the Scheme offers the potential for faster and more reliable bus services. Right Mix does not assume net-zero traffic growth in all areas of GM. However, it is requested that an assessment is undertaken that identifies where any potential increase in traffic resulting from this scheme is offset elsewhere on the SRN network and/or through other mitigation measures, to ensure the plans overall are contributing to Right Mix and the GMTS 2040 policy. National Highways commit to continue to work with TMBC and TfGM throughout the development of the detailed design and assess any updates or changes to relevant policy."</i>
9.88.37	<p>3 CPRE specific responses to 10.2.7 to 9.</p> <p>10.2.7: While Glossop is not within Greater Manchester, many of its trips will be related to the conurbation. The impact is unlikely to be significant but again illustrates the lack of basic information provided by NH.</p> <p>10.2.8: This relates to the supply of matrices in either O&amp;D format or Production and Attraction (P&amp;A) format. This has also been a difficult area because NH appear to have supplied some matrices in O&amp;D, and some in P&amp;A. Had a direct technical dialogue been permitted by NH with their modellers this issue could have been resolved. Questions remain unanswered and this will limit what can be included in an SoCG.</p> <p>10.2.9: This asserts that CPRE has over-estimated trips affected by the scheme. It provides no alternative in this rebuttal, but earlier rebuttals show that their own data confirms the basic point as above.</p>	<p>National Highways does not dispute that many of the trips starting and finishing in Glossop will be to and from the City of Manchester. The benefits of the Scheme, in terms of journey time savings, for these trips are, therefore, captured by the traffic modelling and in the Scheme assessment.</p> <p>This information supplied by National Highways is in different formats because the data needs to be in these formats for the two different, but linked, models. For the public transport model, data needs to be in Production and Attraction (P&amp;A) format. Whereas for the traffic model, the data needs to be in Origin and Destination (O&amp;D) format.</p>
9.88.38	<p>4 Rebuttal to detailed NH Responses to CPRE PDSY REP9-040</p> <p>9.82.2: The BCR and use of scenarios to engage with uncertainty is covered in the response to 10.1 and 10.2 (above). The additional NH point, that "there is currently no published or agreed advice for scheme assessments of projects for the Applicant to refer to" is simply incorrect. TAG Unit M4 has considered uncertainty for some time and currently refers to the Uncertainty Toolkit which has a great deal of relevant material.</p> <p>9.84.5: The very brief NH statement that "The modelling of public transport.... is proportionate in relation to the assessment of the scheme" is both vague and misleading. It does actually rebut the CPRE statement. No reply has yet been received to our request for details of the rail/road modelling. In relation to bus, we have attempted to word something for an SoCG and to the best of our knowledge (and what was said at ISH3) no bus mode switch is available in the model.</p> <p>9.84.6: NH say they have used "the most up to date and recognised DfT traffic forecasts." The latest DfT forecasts are in fact scenario based and refer to the importance of uncertainty in forecasting as well as modelling. (The scenario forecasting started in 2015 at the time of scheme appraisal and was revised in the 2018 DfT forecasting document.) Again the response does not deal with the points about the latest DfT guidance (TAG M4 and Uncertainty Toolkit).</p>	<p>National Highways has nothing further to add to its previous responses on these matters.</p>
9.88.39	<p>5 Rebuttal to detailed NH responses to CPRE REP9-042</p> <p>9.84.10: NH here repeat the mistake of treating the scheme as though it is in an isolated rural area, despite their own data showing the main impacts on local and Greater Manchester traffic. This is further illustrated in the CPRE response to 10.2.</p>	<p>National Highways has not treated the Scheme as though it is in an isolated rural area. The modelling covers a substantial area of north England, with a more detailed and refined level of detail in closer proximity to the Scheme covered by the area of detailed modelling (ADM). The model therefore captures all trips affected by the Scheme, covering both urban and rural areas, that are appropriately assessed in terms of user benefits and impacts. Consequently, the modelling of the Scheme is proportionate and robust, and this has been accepted by the relevant highway authorities.</p>

Reference	IP Issue	NH Response
	<p>9.84.11: NH have clarified the SRN designation point but ignored the more important one: that traffic would be transferred from Motorways to single carriageway parts of the SRN. This is what seems to cause the increase in accidents. While the distance travelled is longer (on the motorways), the accident rates are far lower.</p> <p>9.84.13: NH argue that they do not need to revisit the Strategic level assessment, which is based on an option sifting process. This is incorrect since guidance states that the Strategic Case must be reviewed at each stage of the appraisal process and this should have been done once the</p> <p>Economic Case was drafted. For example, the Treasury Green Book Guide from November 2020 says it is needed at Outline Business Case (pages 43-44) and should confirm the short list. As far as the DCO submissions are concerned, this has not been done.</p> <p>Overall NH have not dealt directly with the issues raised and in some instances offer assertions which do not seem to rebut CPRE's analysis.</p>	<p>The Scheme does result in some limited transfer of traffic from the M62 to the A57. This is because without the Scheme congestion on the A57 through Mottram causes traffic that would otherwise use the A57 to take relatively long detours via alternative routes, such as the M62. With regards to business case updates, please see Applicant's responses to Examining Authority's Third Written Questions (ExQ3) (REP11-010) in response to Third Written Question 3.4.</p>

## **10. REP11-023 Environment Agency - Responses to the Examining Authority's Third Written Questions (ExQ3) and response to Applicants submission at Deadline 10**

### **10.1. Appendix 2 - Technical Comments and Review of Deadline 3: [REP3-025] [9.43 Environmental Statement] Appendix 13.2; Hydrology Risk Assessment dated January 2022**

- 10.1.1. The Environment Agency provided in Appendix 2 to their Deadline 11 response technical comments and review of the Hydrogeology Risk Assessment submitted at Deadline 3 (REP3-025).

### **10.2. National Highways' response**

- 10.2.1. The Applicant has acknowledged the detailed comments provided by the EA on the Hydrogeological Risk Assessment. It has been agreed by both the Applicant and the EA that these comments will be addressed at the Detailed Design stage of the Scheme in consultation with the EA. This is secured through action RD1.15 of the REAC (REP11-005) which states: '*The Hydrogeological Risk Assessment will be updated during Detailed Design, including the results of an updated water features survey, and to address technical comments from the EA following review of version (REP3-025) submitted into the DCO examination*'.

# 11. REP11-024 Peter Simon - Response to the Applicant's comments at Deadline 10 (REP10-010)

Reference	IP Issue	NH Response
9.88.40	<p>1. Overall in response to the Applicant's comments I would refer to the Joint Letter submitted by CPRE to which I was a co-signatory. (REP10-017) Deadline 10 Submission - Letter to the Examining Authority from Interested Parties).</p> <p>This letter shows reasoned scepticism over the overall Scheme modelling on which the Applicant continues to rely. The concern therefore extends to a doubt as to legal and policy compliance especially as regards Air Quality and AQMA infringements. Also by extension in many other areas of legal and statutory importance as for example impacts on the National Park.</p> <ul style="list-style-type: none"><li>The "Letter" also addresses the clear need for the Scheme to extend the traffic model down to cover North Glossopdale. Specifically the Scheme relies on diversions and rat runs but they are not clearly identified in full, or modelled with sufficient precision. The lack of detail is concerning. " A full assessment of the impacts on the road network in Glossop, Hadfield and Padfield must be presented to the Examination and be subject to challenge and scrutiny in the normal way. Without this the ExA cannot assess the adverse impacts of the scheme."</li></ul>	<p>Please refer to National Highways' response (AS-010) to the Joint Letter submitted by CPRE to which was a co-signatory Deadline 10 Submission - Letter to the Examining Authority from Interested Parties (REP10-017).</p>
9.88.41	<p>2. Here in this D11 representation I further consider the lack of precision and selective indifference of the Applicant's approach to impacts on the affected road network outside the immediate DCO area. In the Applicant's response to my REP9-049 it emerges that an assessment they claim to have made of impacts of the Scheme on local villages in fact cannot be identified. The Applicant therefore simply falls back on a claim of "professional judgment" again notably unreferenced and simply anecdotal. NH can produce no reasoned case with evidence that any meaningful or safe conclusion has been reached here.</p> <p>(REP10-10 9.84.38)</p> <p>4. The National Highways conclusion for the Scheme assessment that the additional traffic on both the B6015 Norfolk Street/Woodhead Road, Cemetery Road, Park Road and Hadfield Road (Hadfield Alternative) and the B6015 Norfolk Street, Talbot Street, Dinting Road and Shaw Lane routes due to the Scheme does not result in any adverse effects significant enough to trigger the need for any mitigation has been arrived at using professional judgment based on the absolute forecast changes in traffic flows as predicted by the traffic modelling, which are relatively small.</p> <p>The "generality of response" continues when faced with the cumulative impediments to their required Dinting Road diversion which I listed in (REP9-049) and to which may be added the Traffic Calming measures/ speed humps identified along the length of the route by Mr Bagshaw (REP9-051) They seek to reduce the clear current and future unsuitability of the route for major diversion to a matter of junctions only. This is tantamount to denial.</p> <p>(REP10-010)9.84.40</p> <p>6. Junction delay is generally the most dominant factor in journey times across the modelled road network, rather than average speeds along roads. Journey times in the base model on key routes have been calibrated against observed journey times, therefore the impact of any on-street parking on traffic flows will inherently have been accounted for in the model. Consequently, the presence of on-street parking is not anticipated to result in any significant change in modelled journey times or effects on noise and air quality even with the forecast increases in traffic flows due to the Scheme. Also see National Highways response (7.4 - REP6-017).</p> <p>However even in this limited respect it is obvious that overlooked junctions such as Shaw Lane and the highly dysfunctional crossroads with poor sightlines between Hadfield Road and</p>	<p>The forecast changes in traffic flows along on Dinting Road and Shaw Lane on which the assessment of the impacts of the Scheme (using professional judgement) is based, have been presented into the dDCO examination.</p> <p>Currently there are no confirmed proposals, such as speed humps or an additional pedestrian on Dinting Road, that would impede traffic flows along the Dinting Road/Shaw Lane route. Therefore, the model does not include any such measures and accurately represents the assignment of traffic in the future with the Scheme accounting for forecast traffic growth and certain or near certain proposed highway schemes and developments.</p> <p>The traffic model includes the alternative routes, or rat-runs, to the A57 through Glossopdale and these have been modelled to an appropriate and proportionate level of detail. Calibration of the baseline model against both observed traffic flows and journey times has been undertaken to ensure that it accurately assigns traffic to the road network in response to future forecast changes in the operational performance of the road network due to increases traffic flows and certain or near certain proposed highway schemes and developments.</p> <p>Consequently, National Highways has undertaken an appropriate and proportionate assessment of the impacts of the Scheme on 'rat-runs' through residential areas in accordance with the Department for Transport's (DfT's) Transport Analysis Guidance (TAG Unit M3.1). Moreover, as set out in their responses to the Examining Authority's Third Written Questions (Written Question 3.11) at Deadline 11, Derbyshire County Council (REP11-012) stated that it had no remaining concerns with regards to transport networks and traffic.</p>



Reference	IP Issue	NH Response
	<p>Newshaw Lane, are clear impediments that are not properly accounted for in NH projections. Also the junction at the foot of Hadfield Road with Woolley Bridge Road should be noted where visibility is a particular issue. As the co-signed CPRE letter shows the modelling has simply not extended down to the required level of consideration to “safeguard the villages of Hadfield and Padfield”.</p> <p>“Government guidance TAG Unit M3.1 specifically states that roads in residential areas ‘especially rat runs’ should be assessed. DCC and HPBC have expressed their concerns. ‘Villages of Hadfield and Padfield should also be safeguarded to prevent rat running traffic trying to avoid the strategic road network’ (REP2-051 3.22 and 14.4 response to WC1; emphasised by REP9-033). (P5 of Deadline 10 Submission - Letter to the Examining Authority from Interested Parties)</p> <p>The same casual and imprecise approach is taken towards the requirement for a pedestrian crossing on Dinting Road and the further impediment it places against diverted traffic flow. Having first acknowledged such a development as an obstacle to their plans which would require reconsideration on their part, (REP 6-017) Page 61 7.4 For the routing of traffic across the modelled road network to significantly alter from that forecast by the traffic modelling, physical measures or schemes would need to be introduced onto the road network, such as changes in speed limits, traffic calming measures, additional traffic signals, etc., that would cause drivers to choose alternative competing routes. Any such proposed modifications to the road network would be subject to an impact assessment prior to their implementation that would need to consider the diversionary impact of the scheme on traffic and the consequential environmental effects. No such schemes for Dinting Road and Shaw Lane are proposed.</p> <p>the Applicant now backtracks to shift their position and seeks to minimise expectation of its use simply on the basis of an opinion that it would be “highly unlikely”.</p> <p>REP10-010 9.84.39 5. The Scheme does not result in increases in traffic flows along Dinting Road sufficient to trigger the need for any new controlled pedestrian crossings. When the assessment of the Scheme was undertaken there was no committed scheme that included a new pedestrian crossing across Dinting Road. Consequently, the traffic modelling for the Scheme does not include such a crossing. However, any controlled pedestrian crossing across Dinting Road in the vicinity of Dinting station is very unlikely to be called sufficiently frequently to result in any material impact on average hourly vehicle journey times along the Dinting Road/Shaw Lane corridor, since pedestrian demand will be very intermittent. Thus, inclusion of a controlled pedestrian crossing on Dinting Road in the traffic modelling would be highly unlikely to alter the forecast routing of traffic across the road network.</p> <p>This is not of course the previously self-required re-assessment because the inconvenient evidence would suggest very much otherwise. Not only does the peak hours school commute require frequent use as the Inspectors noted at ISH3 (P2/3 - EV-042) but the major committed developments which are to face onto the road rely in Transport Assessment terms upon regular pedestrian passage across the road to Dinting station. Again the Applicant have failed to extend down their scrutiny to the actual on the ground situation in the present and near future, so as to continue to be in denial of the problems here. Desk top studies with historic vehicle counts and journey times misunderstood the true picture.</p>	
9.88.42	<p>3. The Root Problem</p> <p>The collective letter from “CPRE and others” (REP10-017 ) implies a deep failure of the Scheme to consider the root of the transport problem here which is long term unrestrained traffic growth and a “Predict and Provide” road building culture that belongs to a different era.</p>	<p>National Highways has undertaken the traffic modelling and assessment of the Scheme in full accordance with DfT guidance and has utilised to most up to date and recognised traffic forecasts. No alternative traffic forecasts that are recognised and endorsed by the DfT are available.</p>

Reference	IP Issue	NH Response
	<p>8. The Scheme does not preclude the future introduction of improved public transport services. The number of trips that could potentially switch from car-based to public transport, even with a very significant improvement in public transport provision, is unlikely to substantially alter forecast traffic growth outside of and between large urban towns and cities, which the Scheme is designed to accommodate.</p> <p>(P49 - Deadline 10 Submission - 9.84 Applicant's Comments on Deadline 9 Responses 9.84.41 – REP10-10) As the Examination has shown the Applicant relies heavily and unjustifiably on a speculative transition to Electric Vehicles as a debatable climate and AQ response to enable persistence with uncontrolled traffic growth. Much of the Applicants later DS projections for the Scheme assume a switch to an exclusively battery powered vehicle fleet about which there can be no certainty. This is ultimately aspirational and another example of a failed attempt to force an ill-fitting Scheme into the “Cinderella Slipper” of approval. The Applicant has presented Do Something or Do Minimum scenarios but not one for “Do-Something- Else”. (Ps1/2 Letter to the ExA) The Scheme unrepentantly acknowledges and promotes unsustainable traffic growth at both 9.84.37</p> <p>3. Traffic growth is not contained without the Scheme. There is a greater increase in the forecast displacement of traffic from the main road network to unsuitable alternative roads across the wider area than with the Scheme, just with less traffic growth along the A57</p> <p>and again at 9.84.41</p> <p>8. The Scheme does not preclude the future introduction of improved public transport services. The number of trips that could potentially switch from car-based to public transport, even with a very significant improvement in public transport provision, is unlikely to substantially alter forecast traffic growth outside of and between large urban towns and cities, which the Scheme is designed to accommodate.</p> <p>“Predict and provide” remains the approach even when the will expressed at national level to reduce this is incontrovertible. “The model may be based on a methodology, long applied by the Applicant on schemes for traffic assignment, but it is unsuitable for assessing travel as a whole in the context of new policy such as the national Transport Decarbonisation Plan (TDP), Bus Back Better, Gear Change, and Greater Manchester’s Right Mix. (P2 - Letter to the Examining Authority from Interested Parties REP10-017)</p> <p>So the drive is on nationally and regionally to find more suitable transportation solutions alongside the enhanced opportunity presented by a significant post pandemic shift to work from home. Rather than a misconceived traffic growth offer, a “Do-Something-Else” package should be presented and assessed to firmly address the root issue of unrestrained traffic growth and reflect the need to respond immediately to the declared climate emergency. These things cannot continue to be left as the Applicant would wish. To move in the inappropriate “business as usual” direction is no longer acceptable.</p> <p>As I have stated previously (Page 5 REP9-049) there is an unrealistic expectation of rail locally to underpin all housing development and I would also note transport fares have crept up to an unacceptably exorbitant level. This is not only in rail but across the entire public sphere which perversely steers users away towards private travel. Other parties have noted the need to prioritise better and structured bus provision in the area , (notably “Sharefirst My Journey to School” and CPRE ) and I would hope their view would extend to supporting a subsidised fare programme.</p>	



Reference	IP Issue	NH Response
	<ul style="list-style-type: none"> <li>Yet with this Scheme road based public transport remains even more the poor relation so obviously simply tacked onto the Scheme as an afterthought. To allow such an approach represents an acceptance that car dependency can continue to spiral locally and indeed nationally to the point where it is out of control and dangerously beyond remedy. So the Examination offers a critical opportunity to address this challenge through its recommendation and apply the necessary vision to mitigate the problem.</li> </ul>	
9.88.43	<p>4. Alternatives</p> <p>Parties have brought forward alternatives to the Examination, including Mr Bagshaw's proposed Mottram Gyratory Flow that seeks to deliver an optimal solution for the SRN, the local communities, and the highly sensitive environment. To leave behind the fatal "Predict and Provide" mindset these Alternatives should now be fairly explored in their own right, and not simply as part of a major road building proposal. Such consideration in their own right did not occur with the South Pennine Study from which the flawed outcome emerged to place this Scheme in RIS1 - a programme it has already been seen with the A38 Judicial Review and its aftermath was not necessarily reflective of current climate emergency concerns. NPS NN at 4.27 suggests there is a burden on the Examination here.</p> <ul style="list-style-type: none"> <li>Also more recently the "Stonehenge judgement" suggests a full appraisal of alternatives to the flawed Scheme to be legally required. On all possible grounds such consideration should be instigated at this Examination to enable a beneficial and sustainable outcome that ends countless years of futile expense and the self-evident damage of the Application. This is a vital window of opportunity for critical change.</li> </ul>	Please refer to the Applicant's Comments on Deadline 9 Submissions (9.84.44 -REP10-010).
9.88.44	<p>5. Separately on a procedural point.</p> <p>I continue to maintain (as with REP9-049) that any last minute SOCG between NH/TfGM that might reference and raise significant new matters (such as published in an email reproduced by CPRE in REP09-039) would be "inadmissible" as they would not be fairly examinable within the Inquisitorial process due to lateness</p>	It is normal practice for issues set out in Statements of Common Ground to be discussed between parties throughout examination periods and for the SoCGs to be updated up to and including the final examination deadline. However, National Highways has made an additional submission, accepted by the Examining Authority (AS-010), which has allowed a final draft prior to signature of the Statement of Common Ground with Transport for Greater Manchester to be reviewed by Interested Parties and for any comments to be made prior to examination close.

## 12. REP11-025 Sharefirst My Journey to School - Comments on Response to Written Submissions at Deadline 10

Reference	IP Issue	NH Response
9.88.45	Regarding modelled traffic flow forecast increases from Glossop Spur Road along the A57 corridor towards Dinting and onwards towards Glossop and Snake Pass (being drawn unrestrained from the Strategic Road Network), my current understanding is that the traffic forecast modelling also indicates that there is a greater risk of increase in the forecast displacement of traffic from the main road network to unsuitable alternative roads across the wider area without the Scheme, than with the Scheme. Please can the Applicant correct me if this is not the case?	The displacement of traffic from the main road network to unsuitable alternative roads across the wider area is overall forecast to be greater without the Scheme, than with the Scheme. However, this is on other roads across the modelled road network. Traffic flows on Talbot Road, Dinting Road, Shaw Lane, B6105, Cemetery Road, Park Road and Hadfield Road in Glossopdale are forecast to be greater with the Scheme than without it.
9.88.46	<p>Looking at air quality assessment, National Highways (NH) comments in the section in the NH document 9.72 Addendum to the Statement of Common Ground with High Peak Borough Council, The Use of Multiple Monitoring Surveys in Model Verification on Page 12 on the small data set available from air quality monitoring at Dinting Vale AQMA compared to other air quality monitoring sites, which creates greater uncertainty regarding the AQ assessment for Dinting Vale. National Highways identifies that expanding the data set around Dinting can help determine a more robust</p> <ul style="list-style-type: none"> <li>AQ Assessment. SMJTS additionally contends that a more robust AQ assessment informed by an expanded data set in the area may potentially have a bearing on design for the Scheme.</li> </ul>	<p>The air quality model verification has been undertaken using available data from the local authority monitoring network, as well as monitoring data obtained from scheme-specific surveys undertaken by the Applicant.</p> <p>Given the size of the air quality study area, model verification and subsequent adjustment was 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. Given the unique characteristics in terms of air dispersion at the Dinting Vale junction with Glossop Road (part of the Dinting Vale AQMA [Glossop AQMA]), this area was identified as a small verification zone consisting of properties and monitoring sites within approximately 100 m of the junction. The size of the zone limited the monitoring sites available for model verification to four sites from the Applicant’s scheme specific Trans-Pennine Upgrade (TPU) survey, one High Peak Borough Council site and one site from the Applicant’s older Mottram Moor Link Road (MMLR) survey. The Applicant’s comments on Written Questions Responses, item 7.6 (REP3-021), provides further details on the selection of specific monitoring data for the verification of the Dinting Vale Zone.</p> <p>The four TPU monitoring sites located at the Dinting Vale junction with Glossop Road were installed by the Applicant in August 2018 and decommissioned in December 2021. Given the size of the zone, and availability of data from the Applicant’s TPU survey, the number of sites is considered to be adequate for model verification. The air quality assessment is therefore considered to be robust and in line with the best practice guidance. Additional monitoring at Dinting Vale Junction is unlikely to have materially impacted the outcome of the Scheme air quality assessment and would not therefore have a bearing on the Scheme design. The entirety of the Dinting Vale AQMA (Glossop AQMA) is not included in the Scheme air quality assessment study area, however, the Applicant’s TPU survey did include monitoring sites across the whole AQMA; six sites which ran the full length of the TPU survey (Aug 2018 – Dec 2021) and two additional sites which ran from October 2019 to December 2021. Should the full AQMA have been included in the Scheme air quality study area, given the availability of data from the Applicant’s scheme specific TPU survey, the number of sites would be adequate for model verification.</p>
9.88.47	SMJTS remaining questions relating to air quality and other topics at Deadline 11 are listed in the table below:	See response to the item above. High Peak Borough Council monitor air quality at two locations in the Dinting Vale AQMA (Glossop AQMA). The Applicant’s scheme specific survey, which ran from August 2018 to December 2021, expanded this dataset with an additional eight sites. Given the availability of data from the Applicant’s TPU monitoring survey, the number of sites is considered to be adequate for model verification in both the Dinting Vale verification zone and, had it been included in the Scheme air quality study area, across the wider AQMA.

Reference	IP Issue			NH Response
	Topic	Question to:	SMJTS query	<p>The air quality assessment is considered to be robust and in line with the best practice guidance.</p> <p>National Highways notes that the remainder of the points in this table are directed at other parties.</p>
	Air quality at Dinting Vale AQMA	High Peak Borough Council (HPBC)	<p>In Highways England document 9.72 Addendum to the Statement of Common Ground with High Peak Borough Council, Page 12 The Use of Multiple Monitoring Surveys in Model Verification there is recognition by the Applicant that the data set for air quality monitoring at Dinting Vale AQMA is small compared with other air quality monitoring sites.</p> <ul style="list-style-type: none"> <li>• Please can High Peak Borough Council explain why this may be the case?</li> <li>• Whilst the Air Quality (AQ) assessment that has been conducted appropriately uses the data available, the Applicant has identified an opportunity to improve confidence in the AQ assessment for the Dinting zone and Dinting Vale AQMA by expanding the data set available. Is there any reason why this may not be carried out as part of the Scheme?</li> </ul>	
	Weight restrictions for HGV's on Snake Pass	Derbyshire County Council (DCC)	<p>As a local community we have observed new weight restriction signs of 7.5T imposed on Snake Pass whilst repair works were being carried out in light of recent rainfall and land slippages. Please can DCC advise if new weight restrictions are likely to be a temporary measure or permanent change to road use, and have businesses been consulted on potential impacts?</p>	
	Flood Risk Assessment	Environment Agency (EA), Derbyshire County Council (DCC), Local Lead Flood Authority (LLFA) and High Peak Borough Council (HPBC)	<p>The Flood Risk Assessment (FRA) considers Environment Agency data in order to identify sources of flooding and include an allowance for climate change in assessment of flood risk. The local Strategic Flood Risk Assessment (SFRA) such as carried out by Tameside Metropolitan Borough Council (TMBC) is also consulted to assist assessment of flood risk and inform design.</p> <ul style="list-style-type: none"> <li>• Is there a similar SFRA document available for the area of the dDCO covered in High Peak, perhaps held within DCC, LLFA or HPBC?</li> <li>• In the documentation the EA latest flood incident data refers to October 2019. Please can the EA summarise flood risk data from Woolley Bridge along Brookfield and the A57 corridor towards Dinting and Glossop, which as a local community we should be aware of, particularly in light of proposed housing development around A57?</li> </ul>	
	Glossop Transport Hub	Derbyshire County Council (DCC)	<p>Further to the successful bid for government funding by DCC of the Bus Service Improvement Plan (BSIP), please can DCC indicate priority level for setting up a Glossop Transport Hub, and timings in relation to the A57 Link Road Scheme?</p>	

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