

# **SCOPING OPINION:**

## Proposed Trans-Pennine Upgrade Programme

**Case Reference: TR010034**

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Adopted by the Planning Inspectorate (on behalf of the Secretary of State for Communities and Local Government) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

**December 2017**

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# 1. INTRODUCTION

## 1.1 Background

- 1.1.1 On 08 November 2017, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Trans-Pennine Upgrade Programme (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled "Trans-Pennine Upgrade Programme Environmental Impact Assessment Scoping Report" (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant's request for a Scoping Opinion was accompanied by a letter dated 8 November 2017 that notified the SoS under Regulation 8(1)(b) of the EIA Regulations that the Applicant proposes to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is determined to be EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
  - (b) *the specific characteristics of the development;*
  - (c) *the likely significant effects of the development on the environment;*  
*and*
  - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

- 1.1.8 The matters addressed by the Applicant have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).
- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) *a plan sufficient to identify the land;*
  - (b) *a description of the proposed development, including its location and technical capacity;*
  - (c) *an explanation of the likely significant effects of the development on the environment; and*
  - (d) *such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompass the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10, an ES accompanying an application for an order granting development consent should be based on '*the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.
- 1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) subject to consultation with Natural England. This document must be co-ordinated with the EIA, to avoid duplication of information between assessments.

## **1.2 The Planning Inspectorate's Consultation**

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by

the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

### **1.3 Article 50 of the Treaty on European Union**

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

## **2. THE PROPOSED DEVELOPMENT**

### **2.1 Introduction**

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

### **2.2 Description of the Proposed Development**

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in the Scoping Report at section two.

2.2.2 The proposed development seeks to improve connectivity between Manchester and Sheffield by the creation of a new 1.8km dual carriageway bypass connecting the junction of the M67, A57(T) and A560 to the A57(T) Mottram Moor and a further new 1.3km single carriageway bypass connecting the A57(T) Mottram Moor to the A57 Woolley Bridge. Also included within the description of the Proposed Development is the creation of four new road junctions (Roe Cross Road Junction on Roe Cross Road, Cricket Ground Junction on the new bypass, Mottram Moor Junction on Mottram Moor and Brookfield Junction on Woolley Bridge). Four new structures are proposed; Old Hall Farm underpass, Mottram Tunnel, Carr House Farm underpass and River Etherow Bridge. A number of culverts will be required to carry an existing watercourse beneath the Proposed Development. No information is provided in relation to the scale and dimensions of these structures. A single main compound is proposed with three other locations along the route to be used for storage. There will also be a requirement for temporary access, temporary lay down, work areas and ancillary works.

2.2.3 The proposed application site is located between Manchester and Sheffield on the trunk route of the A57, A628, A616 and A61. The trunk route connects the M67 in the east of the Manchester City Region with the M1 in the north west of the Sheffield City Region. The proposed development is located within the administrative boundaries of Tameside Metropolitan Borough Council and High Peak Borough Council. A site location plan is provided at Figure 1.1 (Appendix B) of the Scoping Report and a plan showing the proposed new road alignment within the redline boundary is presented in Figure 1.2.

2.2.4 The Trans-Pennine Upgrade Programme measures announced in the Road Investment Strategy in 2015 included additional elements such as development of A628 climbing lanes and A61 dualling. The Scoping Report states that these elements have been 'postponed until a later date'.



- 2.2.5 The proposed application site comprises residential, industrial, recreational, open space, rural and urban fringe land uses including community facilities. Existing buildings, other land uses and environmental constraints are shown in figures 5.4 to 5.9 and 5.11 in Appendix B of the Scoping Report. Photomontages of the study area are shown in Figure 5.10 in Appendix B. To the east, the Proposed Development abuts the residential area of Hollingworth. The settlement of Mottram in Longdendale, part of which is a Conservation Area, is located in the centre of the study area. There are two Grade II\* listed buildings, one Scheduled Monument (Melandra Castle Roman Fort) and a number of Listed Buildings within the study area.
- 2.2.6 No statutory designated sites for nature conservation have been identified within the footprint of the Proposed Development although Hurst Clough Local Nature Reserve (LNR) and Great Wood LNR are located within the 2km study area. Dark Peak Site of Special Scientific Interest (SSSI) is located 2.25 km north east of the scheme and is a component of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA) and the South Pennine Moors Special Area of Conservation (SAC).

## **2.3 The Planning Inspectorate's Comments**

### **Description of the Proposed Development**

- 2.3.1 The Scoping Report does not provide a description of the location of the Proposed Development, instead it provides a reference to Figure 1.1 in Appendix B of the Scoping Report which depicts on a plan the location of the Proposed Development. Figure 1.2 of the Scoping Report depicts the proposed new link road alignment within the application site redline boundary. The ES should contain a description of the location of the Proposed Development, which includes existing land uses, structures and receptors across the application site and surrounding area.
- 2.3.2 Section 2.4 of the Scoping Report provides a brief description of the main components of the Proposed Development. The anticipated size, detailed design and location of the proposed Mottram tunnel, River Etherow bridge, underpasses, culverts, road junctions and compounds is not provided in the Scoping Report, which limits the ability of the Inspectorate to comment on the appropriateness of the scope of the assessment in relation to these structures. Details of other components such as signage, gantries, lighting, utilities diversions and environmental mitigation measures are unspecified or are identified as components to be designed. The Applicant's attention is drawn to National Grid's comments regarding existing utilities transmission infrastructure.
- 2.3.3 Scoping Report paragraph 1.2.2 states that the Proposed Development is part of a wider suite of measures to improve the strategic road network in this location (eg A628 climbing lanes and A61 dualling). Where there is reasonable certainty of these schemes coming forward, the Applicant ensure that the ES accompanying the DCO gives due consideration to the potential cumulative impact of the wider scheme proposals.

- 2.3.4 Scoping Report paragraph 2.4.1 highlights that there will be one main construction compound, with a further three compounds to be used for storage. There are no further details provided, such as their location, size or the length of time they will be required. Figure 1.3 of Appendix B to the Scoping Report presents areas required for both permanent and temporary land take. Three areas are shown as being required for temporary land take, yet it is not clear whether the Applicant is seeking to use these areas for the locations of the construction compounds. The ES should include a description of all construction compounds and show the location of them on a plan. The ES should also assess any potential significant effects from the use of construction compounds within relevant aspect assessments.
- 2.3.5 The Scoping Report identifies that a number of culverts will be required, but no further details are provided. The Scoping Report identifies that attenuation ponds will be used to reduce flow into existing watercourses. No further details are provided. The ES should describe in detail the culverts and attenuation ponds required together with their locations, these features should also be depicted on plans to aid the reader. The Applicant should ensure that culvert and bridge designs give appropriate consideration to the need for animal passes (see section 4.3 of this opinion for further detail).
- 2.3.6 The Scoping Report states that the requirement for lighting for the road is currently being developed. Given the proximity of the Proposed Development to the Peak District National Park, if the Applicant decides that lighting is required the ES should assess any associated lighting impacts (eg light spill) as part of relevant aspect assessments. This is discussed further in section 4.4 of this report. Furthermore, the ES should also explain the need for lighting if it is required during the construction phase and in particular any lighting at construction compounds. Impacts associated with lighting proposals should be assessed in the ES with evidence how this has been taken into account in relevant aspect chapters.
- 2.3.7 Paragraph 2.4.13 states that a number of mounds are proposed either side of the route to enhance the level of environmental screening. No further details are provided such as the height or location and total number of mounds required. The ES should describe and depict the locations where earth mounds will be sited as well as their dimensions, taking into account existing ground levels.
- 2.3.8 Road and lane closures are highlighted as being required in section 2.4 of the Scoping Report. The ES should contain a full explanation of all required road closures and diversions whether permanent or temporary and their impacts should be fully assessed. The Applicant should consult with the Royal Mail regarding the proposed traffic management measures.
- 2.3.9 Paragraph 2.4.3 states that "a number of properties would need to be demolished in the vicinity of the Mottram Tunnel". As with the description of structures, no further details are provided. As part of the description of

the physical characteristics of the Proposed Development, the ES should describe the demolition proposals.

- 2.3.10 Construction of the Proposed Development is anticipated to last approximately 3 years and is anticipated to commence from March 2020. The ES should provide details regarding proposed working hours, including for Sundays and bank holidays.

### **Alternatives**

- 2.3.11 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.
- 2.3.12 The Inspectorate would expect to see a discrete section in the ES that provides details of the alternatives considered and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.
- 2.3.13 The alternatives discussion within the ES should expand on the information provided in Scoping Report section 3 Assessment of Alternatives, including the detail of the options selection process. In view of the fact that the preferred option will involve the acquisition and demolition of residential properties it is important that the balance of costs and effects for the different options are clearly explained in the ES.

### **Flexibility**

- 2.3.14 The Applicant's attention is drawn to the Inspectorate's Advice Note 9 'Using the 'Rochdale Envelope'<sup>1</sup>, which provides additional details on the recommended approach.
- 2.3.15 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be consistently and clearly defined in the draft DCO (dDCO) and therefore in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed

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<sup>1</sup> Advice Note nine: Using the Rochdale Envelope. 2012. Available at:  
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.

- 2.3.16 It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the DCO application the Applicant may wish to consider requesting a new scoping opinion.
- 2.3.17 It is noted that there are a number of design areas such as structures (e.g. tunnels, underpasses and bridges), earthworks design, lighting and drainage that are not described in detail in the Scoping Report that will need to be fully assessed within the Applicant's ES. Such assessments must be based on detailed parameters, taking into account any proposed limits of deviation.

## **3. EIA APPROACH**

### **3.1 Introduction**

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note 7 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'<sup>2</sup> and associated appendices.
- 3.1.2 Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

### **3.2 Relevant National Policy Statements (NPSs)**

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the transport sector is the NPS for National Networks (NPSNN).

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<sup>2</sup> Advice Note seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping. Available from:  
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

### 3.3 Scope of Assessment

#### General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- To demonstrate how the assessment has taken account of this Opinion;
- To identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- To set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
- To describe any remedial measures that are identified as being necessary following monitoring; and
- To identify where details are contained in the Habitats Regulations Assessment (HRA) report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

3.3.2 The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.

3.3.3 The Inspectorate notes there is very little information in the Scoping Report to explain the physical characteristics of the Proposed Development including the main structures, construction and maintenance phases of the Proposed Development eg detailed description of location and size of the proposed Mottram tunnel, road junctions, River Etherow bridge structure, construction compounds, location and dimension of culverts and underpasses, location and dimension of earth mounds and road closures or diversions, including for Public Rights of Way (PRoW). The ES should include a description of these characteristics which should be used to inform the assessment in relevant aspects.

#### Baseline Scenario

3.3.4 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the

basis of the availability of environmental information and scientific knowledge.

### **Forecasting methods or evidence**

- 3.3.5 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.6 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. Any departure from that methodology should be described in individual aspect assessment chapters.
- 3.3.7 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

### **Residues and emissions**

- 3.3.8 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

### **Mitigation**

- 3.3.9 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, ideally with reference to specific DCO requirements or other legally binding agreements.
- 3.3.10 Provision of an assessment of pre- and post-mitigation impacts is recommended since this greatly aids understanding of the efficacy of any mitigation measures proposed and therefore the reliance placed on such measures.

### **Vulnerability of the development to risks of major accidents and/or disasters**

- 3.3.11 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as

Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

### **Transboundary effects**

- 3.3.12 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes that the Applicant has not indicated in the Scoping Report whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.
- 3.3.13 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.
- 3.3.14 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.

### **A reference list**

- 3.3.15 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

## **3.4 Confidential Information**

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.



## 4. ASPECT BASED SCOPING TABLES

### 4.1 Air Quality (Scoping Report section 5.2)

The study area for construction effects is 200m from the construction site boundary, based on the Design Manual for Roads and Bridges (DMRB) HA207/07. The construction site boundary is not formally defined in the Scoping Report and it does not specifically address the impact of construction traffic flows on emissions within local Air Quality Management Areas (AQMAs), which is a requirement of DMRB where the construction stage exceeds 6 months. For operation, the study area will be determined having regard to the predicted extent of change in traffic flows on the local road network, also based on threshold values defined in DMRB.

The assessment method comprises DMRB HA207/07, supplemented by Interim Advice Notes (IAN) including (170/12; 174/13; 175/13; 185/15) and Defra's Local Air quality management technical guidance (LAQM.TG16).

The Applicant identifies that air quality could be affected on roads within AQMA and that the annual mean NO<sub>2</sub> Air Quality Strategy (AQS) objective could be exceeded at some roadside receptors.

No matters have been proposed to be scoped out of the assessment.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
1	n/a	n/a	n/a
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
2	5.2.1 11.1.1 Figure 1.3	Study area.	The description of study areas within the Scoping Report is open to interpretation due to the lack of definition of the boundary from which study areas have been taken. For example, the Scoping Report refers to "construction site boundary" in the air quality methodology, "the Scheme" in the cultural heritage, road drainage and the water environment and geology and soils methodologies, "the scheme boundary" in the people and communities and noise and vibration methodologies.  Scoping Report figures refer to the 'redline boundary', which includes areas of temporary land take for construction and permanent operational land take i.e. the maximum anticipated scheme footprint. Within the Applicant's ES the boundary

			<p>from which study areas are derived should be clearly defined, unambiguous and cross referenced to a plan.</p> <p>The Applicant proposes to apply the DMRB HA207/07 methodology to assessment of construction dust and to define the study area. The ES should explain and justify why more recent criteria, which recognise that construction dust effects may occur over a wider extent than is proposed to be assessed, have not been adopted (e.g. the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction 2014).</p> <p>The ES should also assess impacts from construction vehicles in line with DMRB HA207/07, since construction is expected to last for more than 6 months. The Applicant should consider the need to supplement the assessment with modelling of construction vehicle movements as an additional scenario. The need to include a quantitative assessment should be discussed with the relevant local authority Environmental Health Officers.</p> <p>The extent of the operational air quality model should be agreed with the relevant planning authorities following completion of the transport modelling process. The study area should be sufficient to consider consequential effects during operation, eg such as increases in traffic on the A616, A628 (including in the village of Tintwistle) and the AQMA at Langsett due to the enhanced attractiveness of the route to users.</p>
3	5.2.4	EU Ambient Air Quality Directive	<p>The Inspectorate considers that the ES should include an assessment of impacts associated with all relevant pollutants under the EU ambient air quality directive including increases in PM<sub>2.5</sub> resulting from the Proposed Development where relevant. The Applicant's attention is drawn to Public Health England's comments in this respect. In determining significance, the assessment should take into account performance against relevant target/limit values.</p>
4	5.2.5(5)	Scenarios to be modelled	<p>In accordance with DMRB the assessment scenarios to be modelled should also include the worst year in the first 15 years</p>

			from opening where this is different from the scenarios set out.
5	5.2.6(4)	Use of historical meteorological data	The Applicant should have regard to the potential for climate change to influence future meteorological conditions and the potential for this to impact on emissions modelling and set out how future changes would be evaluated.

## 4.2 Cultural Heritage (Scoping Report section 5.3)

The proposed study area is 1km from the scheme for designated assets and 500m for non-designated assets.

The assessment method comprises a detailed desk based assessment and site based evaluation (walkover survey).

The Scoping Report identifies potential impacts on the setting of Mottram in Longdendale Conservation Area and Grade II listed buildings during construction and operation. Potential effects on archaeological remains are also highlighted, although the extent of such remains is uncertain at present.

The Applicant proposes to scope out historic landscape character effects and an assessment of effects on the settings of two Grade II\* listed buildings.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
6	5.3.6(3)	Effects on two Grade II* listed buildings	There is insufficient detail provided to understand the potential effects of the Proposed Development on the Grade II* listed Church of St Michael and All Angels or its setting, consequently the Inspectorate does not consider that an assessment of effects on this building should be scoped out of the ES. The Applicant's attention is drawn to Historic England's comments in respect of the assessment. The Inspectorate considers that significant effects on the Grade II* listed Cross are unlikely and may be scoped out based on its nature and location relative to the scheme.
7	5.3.6(4)	Historic landscape character assessment.	The baseline text in the Scoping Report states that a reasonably high degree of time-depth exists in the landscape. On this basis and due to the lack of justification or evidence for scoping out such an assessment it is considered that an historic landscape character assessment should be undertaken and the scope agreed with the relevant local conservation officers and Historic England as appropriate. The Inspectorate also notes the paragraph 5.145 of the NPSNN which requires an assessment of historic landscape character

	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
8	5.3.1 Figure 1.3 Figure 5.4	"In accordance with DMRB HA 208/07, the study area will encompass an area extending 1km from the Scheme for designated heritage assets and 500m for non-designated heritage assets"	DMRB HA208/07 does not specify particular distances to be applied to study areas. The ES should justify any study areas adopted for the assessment. The final study area should be defined with reference to the Zone of Visual Influence for the scheme, which has not yet been prepared. Please also refer to study area comments in section 4.1 of this report.
9	5.3.2	Baseline information	Historic England highlights that mesolithic remains are present within the study area in addition to the baseline features set out in section 5.3.2. Impacts on mesolithic archaeology should be considered within the Applicant's desk study and used to inform the need for further archaeological investigation, which should be agreed with the relevant local authority conservation officers.
10	5.3.3(2)	Intrusive and non-intrusive investigations	The Inspectorate does not consider the measures set out (trial trenching and geophysical survey) to be mitigation, since these measures inform the scope of assessment and therefore the likely significant effects of the development. The Inspectorate considers that geophysical surveys should be undertaken to inform the general assessment and to identify the need for further more detailed assessment where necessary. The Applicant should discuss and seek to agree the scope of such assessments with Historic England, the County Archaeologist and/or relevant local authority conservation officers as appropriate following completion of the desk study and site walkover assessment.
11	5.3.2 5.3.4	Settings effects	No reference is made to the potential for the Proposed Development to impact the setting of Melandra Castle Scheduled Monument identified in paragraph 5.3.2 of the Scoping Report. Impacts on this receptor should be assessed as part of the ES. The ES should also assess the impact of potential increases in traffic on the Tintwistle Conservation Area.

12	5.3.5	Assessment methodology	The ES should explain why more recent guidance prepared by Historic England and the Chartered Institute for Archaeologists has not been adopted or referenced in respect of the cultural heritage assessment. The Applicant should address Historic England's comments regarding the proposed cultural heritage significance criteria in their ES methodology.
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### 4.3 Biodiversity (Scoping Report section 5.4)

The proposed study area is 2km from “the scheme” for statutory and non-statutory designated sites and up to 30km for Special Areas of Conservation (SAC) for bats.

The proposed assessment method is based on DMRB Volume 11, Section 3, Part 4 and the 2016 Chartered Institute for Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal 2<sup>nd</sup> edition 2016 guidelines, which are industry standard assessment methods. Reference is also made to British Standards (BS) for tree works including BS3998:2010<sup>3</sup> and BS5837:2012<sup>4</sup>; Arboricultural Association and the National Joint Utilities Group (2004) guidelines<sup>5</sup>.

The Applicant identifies the potential for direct effects on certain habitats and species including otter which is a European protected species.

The Applicant suggests that baseline surveys support scoping out a range of species and habitats surveys.

ID	Para	Applicant’s proposed matters to scope out	Inspectorate’s comments
13	5.4.6(6/7)	<p>Selected Species and species groups/ habitats:</p> <ul style="list-style-type: none"> <li>• White-clawed crayfish;</li> <li>• Aquatic invertebrates;</li> <li>• Terrestrial invertebrates;</li> <li>• Reptiles;</li> <li>• Dormice;</li> <li>• Peak District Moors (South Pennine Moors Phase 1) SPA,</li> </ul>	<p>The Applicant proposes to scope out an extensive number of habitat and species specific surveys and assessments of impacts on designated sites. The Inspectorate notes the comments of Tameside Borough Council but the Scoping Report fails to provide baseline survey data to support the proposed scope. The Inspectorate also considers that there are likely to be impacts on these matters relating to the potential increase in traffic on the Trans-Pennine route. On this basis the Inspectorate considers that these surveys cannot be scoped out of the assessment (refer to paragraph 3.1.2 of this Opinion).</p>

<sup>3</sup> BS3998:2010. Tree work recommendations. BSI.

<sup>4</sup> BS5837:2012. Trees in relation to design, demolition and construction – recommendations. BSI.

<sup>5</sup> Guidelines for the planning, installation and maintenance of utility services in proximity to trees. NJUG. 2004.

		<p>Hurst Clough LNR and Great Wood LNR;</p> <ul style="list-style-type: none"> <li>• Non-statutory designated sites;</li> <li>• Other S41 and non-S41 Habitats;</li> <li>• Protected and Notable Plants (including Fungi);</li> <li>• Invasive flora</li> <li>• Amphibians; and</li> <li>• Other Mammals (Hedgehog, Polecat and Brown Hare).</li> </ul>	<p>The Applicant should seek further agreement as to the final scope of the assessment including for designated sites (eg Dark Peak SSSI, South Pennine Moors SAC and the Peak District Moors SPA) where impacts may occur, with the relevant local authority ecologists and Natural England, as appropriate. The Applicant's attention is drawn to the specific habitats and receptors identified as being potentially affected by Peak District National Park Authority.</p>
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
14	5.4.1 Figure 1.3	<p>"In accordance with DMRB Volume 11, Section 3, Part 4, the study area would extend to 2km from the scheme for statutory and non-statutory designated sites and up to 30km for (SACs)...."</p>	<p>DMRB Volume 11, Section 3, Part 4 does not specify any particular distances applied to establish study areas. The Applicant should justify the study area(s) adopted for each assessment in the ES. The Inspectorate assumes that "the scheme" refers to the redline boundary indicated in Figure 1.3 of the Scoping Report.</p> <p>The Applicant should assess impacts which may increase load values at designated sites and give rise to consequential adverse effects alone and cumulatively with other proposed development. The assessment study area should extend to ensure coverage of the entire impact area rather than an arbitrary 2km study boundary.</p> <p>Please also refer to study area comments in section 4.1 of this report.</p>
15	5.4.3	Mitigation	<p>The Applicant should address the specific mitigation requirements set out by the consultation bodies with respect to habitat and protection of watercourses including the need to ensure no net loss to the aquatic/riparian environment and the establishment of buffer zones beside watercourses. The Applicant's attention is drawn to the comments of the Environment Agency in this respect.</p>
16	5.4.5	Assessment methodology	<p>The Applicant should ensure that the context of climate change (in terms of effects on the future baseline for</p>



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			biodiversity) and noise and vibration effects on biodiversity are considered in the ES. River Corridor Surveys should be undertaken for any watercourse impacted by the scheme.
17	5.4.6	Otters/water vole	In light of the potential for impacts on otters and water vole, the Applicant should ensure that culvert and bridge designs give appropriate consideration to the need for animal passes.
18	5.5.3	Lighting	Impacts from construction and operational lighting to protected species (e.g. bats) including the potential to cause severance to flight paths should be assessed.

## 4.4 Landscape and Townscape (Scoping Report section 5.5)

The study area is proposed to be defined based on desk study, site survey, use of a Zone of Theoretical Visibility (ZTV) and professional judgement.

The proposed assessment scope follows industry standard guidance, such as the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and DMRB.

The Applicant identifies the potential for significant adverse landscape character and visual amenity effects.

No landscape and visual elements are proposed to be scoped out.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
19	n/a	n/a	n/a
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
20	5.5.1	Study area	The assessment study area should take into account impacts due to induced traffic flows on wider landscape and visual receptors including the National Park. Please also refer to study area comments in section 4.1 of this report.
21	5.5.2	Selection of seven representative viewpoints.	The Inspectorate welcomes the Applicant's commitment to consult with relevant local planning authorities to discuss and agree the final selection of representative viewpoints for inclusion in the ES. The ES should assess any significant effects anticipated to viewpoints from Tintwistle Low Moor and the Pennine Way/Trans-Pennine Trails.
22	5.5.3	Planting strategy and new road alignment.	The Applicant should consider the potential for the proposed planting strategy and new road alignment to be designed to enhance the existing Public Rights of Way (PRoW) network, where feasible.
23	5.5.3	Street lighting design strategy.	The visual impact of night-time lighting on residential receptors and ecology should be assessed within the ES and night-time photomontages should be included where appropriate. See also comments under section 4.3 of this opinion.

## 4.5 People and Communities (Scoping Report section 5.6)

The proposed study area is 10m from the scheme boundary for direct effects on people/community assets and 500m for other effects.

The proposed people and communities assessment methodology combines several sections of DMRB into a single assessment method based on guidance in IAN 125/15.

Significant adverse and beneficial effects are predicted for a number of receptors, although these are not identified at present.

The Applicant proposes to scope out effects on strategic employment sites and commercial enterprises.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
24	5.6.6	Effects on strategic employment sites.	The Inspectorate considers that an assessment of impacts on strategic employment sites can be scoped out of the ES due to an absence of such sites within the study area. The Applicant's ES should demonstrate by reference to the local plan process that there are no such sites existing or proposed in the study area.
25	5.6.6 Figure 5.11	Effects on commercial enterprises.	Figure 5.11 of the Scoping Report suggests that the Mottram Agricultural Showground will experience direct impacts from the Proposed Development. The ES should include an assessment of impacts on this commercial enterprise. The ES should include an assessment of the impact on agricultural land holdings where applicable. The Applicant should seek to agree with the local planning authority the detailed list of receptors to include in the assessment.
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
26	5.6.1	Study area	The study area should be sufficient to assess the potential for consequential road safety effects to arise due to increases in traffic on the Trans-Pennine route in operation. The final study area should be informed by the likely area of impact defined through the transport model.  Please also refer to study area comments in

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			section 4.1 of this report.
27	5.6.2	Public Rights of Way (PRoW).	The ES should assess the impact of severance to PRoW including footpaths. If mitigation is proposed this should include consideration of new PRoW provision as part of the overall scheme design.
28	5.6.2 6.3	Development land	The assessment of impacts on People and Communities should have regard to the current draft allocations within the draft Greater Manchester Spatial Framework (GMSF). These allocations should also be taken into account in the cumulative effects assessment process. The Applicant should refer to Tameside Borough Council's comments in this respect.
29	11.1.32	Approach to assessment of significance.	The application of professional judgement to assess significance should be fully justified in the Applicant's ES. The relevant sensitivity and value criteria applied to this aspect assessment should be presented and explained in the ES.

## 4.6 Noise and Vibration (Scoping Report section 5.7)

The proposed construction study area is 300m from the scheme boundary or 300m from routes experiencing an increase in noise >1dB as a result of the scheme. The operational study area is proposed to be defined in accordance with DMRB HD213/11 and with respect to the affected road network defined by a scheme specific Saturn model.

The proposed construction assessment methodology is based on industry standard guidance (BS5228:2009+A1:2014) and the operational methodology is based on DMRB HD213/11 supported by noise modelling.

Significant construction noise and vibration effects and operational noise effects are predicted, including effects in excess of the Significant Observed Adverse Effect Level (SOAEL).

The Applicant proposes to scope out the effects of Groundborne vibration from road traffic.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
30	5.7.6	Groundborne vibration from road traffic.	<p>The Inspectorate considers that groundborne vibration from road traffic cannot be scoped out due to the proximity of existing residential receptors to the proposed tunnel at Mottram and due to the issue of increasing heavy goods vehicle movements climbing and braking on the A628.</p> <p>The assessment should also consider the impact of ground borne noise from Mottram tunnel, where applicable. The final scope of the noise and vibration assessment should be agreed with the relevant local authority Environmental Health Officers.</p>
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
31	5.7.1	Study area	<p>The extent of the operational noise model should be agreed with the relevant planning authorities following completion of the transport modelling process. The study area applicable to the assessment should be sufficient to include any consequential impacts, eg such as increases in traffic on the A616, A628 due to the enhanced attractiveness of the route to users.</p>

			Please also refer to study area comments in section 4.1 of this report.
32	5.7.4 Table 11.17	SOAEL and Lowest Observed Adverse Effect Level (LOAEL).	Reference is made to both SOAEL and LOAEL. Consistent with the Noise Policy Statement for England (NPSE), LOAEL and SOAEL should be defined for all of the construction and operational noise and vibration matters assessed (eg airborne noise, groundborne vibration etc). Mitigation measures should be set out accordingly.
33	11.1.34 to 11.1.40	Vibration significance criteria	The Scoping Report refers to BS5228 part 2 and DMRB HD213/11 which both include vibration significance criteria. The Scoping Report does not explicitly set out these criteria in Appendix A. The construction and operation vibration criteria used for the assessment should be clearly presented and explained in the ES.

## 4.7 Road Drainage and the Water Environment (Scoping Report section 5.8)

The study area is 500m from the scheme, although the study area may be extended where necessary.

The proposed assessment methodology is DMRB HD45/09 supplemented by hydrological and hydraulic modelling; three dimensional numerical modelling, hydrogeological risk assessment, a water features survey and groundwater level monitoring. The potential for overlap between geology and soils assessments and the road drainage and the water environment assessment is highlighted in section 4.8 of this report.

The Applicant identifies potential effects on water resources in the absence of embedded design and mitigation measures. A key potential effect is identified as deterioration of the Water Framework Directive (WFD) status of waterbodies receiving highway runoff.

The Applicant proposes to scope out operational effects assessment.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
34	5.8.3 5.8.6	Operational effects	<p>The Scoping Report proposes to scope out an assessment of operational effects on the basis that design mitigation measures would be agreed with the Environment Agency and the Lead Local Flood Authority. The Inspectorate notes the potential impact on WFD status at waterbodies identified within the study area at paragraph 5.8.3 of the Scoping Report. There is also potential for operational flooding at the proposed Woolley Bridge junction. The Inspectorate considers that these impacts may result in significant effects and so does not agree to scope these matters out of the ES. The Inspectorate also notes the NPSNN requirement to consider impacts on WFD waterbodies.</p> <p>The Inspectorate also considers that the scope of the flood risk assessment should include the potential interaction between emptying of upstream reservoirs and the Proposed Development, where appropriate. The ES should assess the interplay between flood risk and traffic flows in any crossing solution for the River Etherow.</p>

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			The Applicant's ES and WFD assessment should have regard to the relevant River Basin Management Plan and the detailed WFD assessment scope should be agreed with the Environment Agency.
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
35	5.8.1	Study area	Please also refer to study area comments in section 4.1 of this report.
36	5.8.1	Hydraulically linked designated sites	The Scoping Report states that the study area will be extended to consider impacts on hydraulically linked sites 'where necessary'. It is unclear what the trigger for such an assessment would be. The ES should identify assessed impacts on relevant sites where significant effects are likely to occur.
37	5.8.2	Groundwater Water Framework Directive (WFD) status	The Applicant should ensure that the ES assessment includes WFD status as an attribute or indicator of quality in assessments of impacts on both surface and groundwater.
38	5.8.2	Additional information	The additional information required to assess the effect of bridge and culverting works should include scour and geomorphological assessments, where relevant, the detailed scope of which should be agreed with the Environment Agency and Lead Local Flood Authority as appropriate.  Bridge and culvert solutions should have regard to effects on protected aquatic/ riparian species such as otter/water vole as raised in section 4.3 of this opinion.



## 4.8 Geology and Soils (Scoping Report section 5.9)

The proposed study area is a 250m buffer either side of the scheme. The scheme boundary is not formally defined.

The proposed assessment methodology is based on DMRB Volume 11, Section 3, Part 11; Environment Agency Model Procedures for the Management of Land Contamination (CLR11) and CIRIA guide C552 Contaminated Land Risk Assessment.

The Applicant identifies the potential for adverse effects on human health to arise from contact with contamination during construction. A beneficial effect is identified due to tunnelling arising from exposure of geology as a learning resource.

No geology and soils elements are proposed to be scoped out.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
39	n/a	n/a	n/a
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
40	5.1.3	Population and health	The list of matters to be considered as part of a broader population and health assessment within the cumulative effects assessment does not currently include geology and soils, although human health impacts may arise from a potential adverse construction effect in relation to this aspect. The Applicant should consider geology and soils impacts within the broader assessment of impacts on population and health.
41	5.9.1	Study area	Please also refer to study area comments in section 4.1 of this report.
42	5.9.1	250m study area buffer	It is unclear why the study area buffer is restricted to 250m and is considered to be the distance over which potentially contaminative sites could cause an impact when the cumulative ZOI is set at 1km. The final study area requires further explanation/ justification and should be determined according to the extent of impacts.
43	5.9.2	Baseline data	The Inspectorate notes the potential overlap in datasets used for the cultural heritage; road drainage and the water

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			<p>environment; and geology and soils sections and recommends that duplication of these datasets is minimised in order to minimise the size of the ES.</p> <p>The Applicant's attention is also drawn to comments from the Coal Authority regarding potential risks to development.</p>
44	5.9.2	Ground investigation	The ground investigation should have regard to the potential for subsurface archaeological remains to be present within the study area (as highlighted in section 4.2 of this Opinion).
45	5.9.3	Management plans	This section makes reference to management plans including emergency/spill response plans; Construction Environmental Management Plan (CEMP); Site Waste Management Plan (SWMP) and Materials Management Plan (MMP). The Applicant should provide draft copies of these documents appended to the ES and/or demonstrate how they are intended to be secured through the dDCO.
46	5.9.4	Geology exposure as a beneficial learning resource in operation.	The Inspectorate welcomes the proposed geological learning resource and considers that the Applicant should assess constraints associated with visiting and studying such an exposure such as accessibility.
47	5.9.5	Methodology	The Applicant should refer to the Environment Agency guiding principles for land contamination when assessing risks to controlled waters from the site.
48	11.1.46 to 11.1.49	Inclusion of hydrogeology and hydrology in significance criteria.	The Applicant should ensure that the assessment of effects is consistent with any assessment of significance based on hydrogeology and hydrology criteria adopted for the Road Drainage and the Water Environment assessment.

## 4.9 Materials (Scoping Report section 5.10)

No specific study area is proposed since a 'whole-market' approach to materials procurement is proposed.

The proposed assessment methodology is based on DMRB HA 205/08 and IAN 153/11.

No adverse effects are identified in relation to capacity of waste management infrastructure, effects on material resources or waste from construction, demolition and excavation (CDE) activities. The Applicant identifies that cumulative effects on material resources and waste capacity may be significant.

The Applicant proposes to scope out operational materials effects.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
49	5.10.6	Operational material effects	The Inspectorate agrees that significant operational effects with regards to materials are unlikely and can be scoped out from further assessment provided that the effect of any resurfacing activity is addressed as part of the GHG assessment.
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
50	5.10.3	Management plans	The Applicant makes reference to management plans including a CEMP and SWMP. The Applicant should submit drafts of these documents appended to the ES also demonstrating how the proposed mitigation would be secured eg by cross referencing to the Applicant's dDCO.

## 4.10 Climate (Scoping Report section 5.11)

The proposed climate assessment considers climate resilience and adaptation in the context of the north west region and greenhouse gas (GHG) effects based on the extent of the Saturn traffic model for the Proposed Development.

The GHG assessment is based on the GHG subobjective of the Transport Assessment Guidance (TAG) Unit A3; paragraph 5.17 of the NPSNN and the PAS2080:2016 Carbon Management in Infrastructure methodology. No specific methodology is stated in relation to climate change adaptation and resilience, although paragraph 4.40 of the NPSNN is referenced.

No significant construction effects are predicted. The operation of the scheme is predicted to change GHG emissions.

No elements are proposed to be scoped out.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
51	n/a	n/a	n/a
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
52	5.11.1	Study area	The study area for GHG emissions is the extent of the traffic model, which is not determined at present. The study area should be defined in the Applicant's ES and should take account of induced traffic flows due to operation of the scheme in the north west and in the Peak District National Park.
53	5.11.2	UK climate projections	The applicant should clearly state the range of climate projections used for the purposes of any adaptation or resilience assessment. It is noted that updated Met Office projections are anticipated in 2018.
54	5.11.5(3)	No recognised significance criteria	Scoping report paragraph 5.11.5 states that significance of impacts will be assessed by comparing estimated GHG emissions from the Proposed Development against UK carbon budgets. Paragraph 11.1.55 of the Scoping Report states that no recognised significance criteria are available, so the assessment will demonstrate levels of emissions predicted for construction and operation. For the avoidance of doubt, the Applicant should provide a conclusion regarding the significance of assessed

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			climate change impacts.
55	5.11.5	Scope of GHG assessment	The Applicant should assess the impact of any resurfacing activity as part of the GHG assessment, where this has potential to give rise to likely significant effects.

## 4.11 Cumulative Effects (Scoping Report section 6)

The study area proposed is broadly consistent with study areas used in the individual aspect chapters, although air quality and noise and vibration remain to be defined and the landscape and cultural heritage ZOI may be set over a shorter distance than necessary based on comparison with the ZTV and the final transport modelling outputs for the Proposed Development. As with other aspects of the assessment, the boundary from which the ZOI is defined is not clearly stated.

The proposed cumulative effects assessment methodology is consistent with Advice Note 17 (AN17).

No likely significant effects are identified at this stage and no elements are proposed to be scoped out.

<b>ID</b>	<b>Para</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
56	n/a	n/a	n/a
	<b>Para</b>	<b>Other points</b>	<b>Inspectorate's comments</b>
57		Zones of Influence	
	6.1.6 Table 6.1	Study area Landscape ZOI is limited to 1km. Cultural heritage ZOI and ZOI relating to the transport modelling outputs.	The Inspectorate considers that it is premature to establish a 1km landscape and visual study area when the ZTV for the Proposed Development has not yet been established and it could therefore be substantially greater than 1km. The Applicant should consider the need for a broader landscape and visual ZOI. Similarly the ZOI for cultural heritage and settings effects should be informed by the ZTV rather than confined to an arbitrary boundary. Transport modelling outputs are also not yet confirmed. The Applicant should finalise ZOI which rely on transport model outputs (eg air quality and noise and vibration) once the model outputs are available. Please also refer to study area comments in section 4.1 of this report.
58	6.3.1	Desk study	The base datasets that have been used to inform the cumulative effects assessment desk study are not stated. This information should be provided in the Applicant's ES.
59	6.3.4	Threshold criteria	The threshold criteria used to shortlist

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			projects are not stated and should be set out in the Applicant's ES for transparency.
60	6.3.8	"following agreement from the Planning Inspectorate.. ..more detailed information would be gathered on the other developments"	'Other development' to be assessed within the ES should be agreed with the relevant consultation bodies and should consider effects on Dark Peak SSSI, South Pennine Moors SAC and the Peak District Moors SPA; national trails and Tintwistle Village and Conservation Area.
61	1.2.2	Development of A628 Climbing Lanes and A61 Dualling.	The Scoping Report states that these schemes have been postponed until a later date to allow further consideration of the benefits associated with them. The Applicant should provide justification for excluding such schemes from the cumulative assessment eg by reference to the tiered approach set out in the Inspectorate's AN17 or provide an assessment of the cumulative effect of these schemes where there is reasonable certainty regarding their development.

## 5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus<sup>6</sup>
- Planning Inspectorate advice notes<sup>7</sup>:
  - Advice Note Three: EIA Notification and Consultation;
  - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
  - Advice Note Five: Section 53 Rights of Entry (Planning Act 2008);
  - Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping;
  - Advice Note Nine: Using the 'Rochdale Envelope';
  - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
  - Advice Note Twelve: Transboundary Impacts
  - Advice Note Seventeen: Cumulative Effects Assessment; and
  - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

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<sup>6</sup> The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

<sup>7</sup> The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>



## APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

**TABLE A1: PRESCRIBED CONSULTATION BODIES<sup>8</sup>**

<b>SCHEDULE 1 DESCRIPTION</b>	<b>ORGANISATION</b>
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Tameside and Glossop Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England - North West
The relevant fire and rescue authority	Greater Manchester Fire and Rescue Service
	Derbyshire Fire and Rescue Service
The relevant police and crime commissioner	Greater Manchester Police and Crime Commissioner
	Derbyshire Police and Crime Commissioner
The Environment Agency	The Environment Agency - Greater Manchester, Merseyside and Cheshire; East Midlands
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Tameside Metropolitan Borough Council
	Derbyshire County Council
The relevant strategic highways company	Highways England - Yorkshire & North East; North West
The Coal Authority	The Coal Authority
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission - North West

<sup>8</sup> Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations')

<b>SCHEDULE 1 DESCRIPTION</b>	<b>ORGANISATION</b>
The Secretary of State for Defence	Ministry of Defence

**TABLE A2: RELEVANT STATUTORY UNDERTAKERS<sup>9</sup>**

<b>STATUTORY UNDERTAKER</b>	<b>ORGANISATION</b>
The relevant Clinical Commissioning Group	Tameside and Glossop Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
The relevant NHS Trust	North West Ambulance Service NHS Trust
Railways	Highways England Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	Environment Agency - Greater Manchester, Merseyside and Cheshire; East Midlands
The relevant water and sewage undertaker	United Utilities
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd

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<sup>9</sup> 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

Scoping Opinion for  
Trans-Pennine Upgrade Programme

<b>STATUTORY UNDERTAKER</b>	<b>ORGANISATION</b>
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	Energy Assets Power Networks
	ESP Electricity Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Utility Distribution Networks Limited
	Electricity North West Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc

**TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))<sup>10</sup>**

<b>LOCAL AUTHORITY<sup>11</sup></b>
Tameside Metropolitan Borough Council
High Peak Borough Council
Derbyshire County Council
Peak District National Park Authority
Manchester City Council
Oldham Council
Sheffield City Council
Stockport Council
Staffordshire Moorlands District Council
Kirklees Council
Barnsley Council
Cheshire East Council
Derbyshire Dales District Council
Rotherham Metropolitan Borough Council
Derby City Council
Leicestershire County Council
Staffordshire County Council
Nottinghamshire County Council

**TABLE A4: NON-PRESCRIBED CONSULTATION BODIES**

<b>ORGANISATION</b>
Greater Manchester Combined Authority

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<sup>10</sup> Sections 43 and 42(B) of the PA2008

<sup>11</sup> As defined in Section 43(3) of the PA2008

## **APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES**

Consultation bodies who replied by the statutory deadline:

Barnsley Metropolitan Borough Council
The Coal Authority
Derby City Council
Derbyshire County Council
The Environment Agency
ESP Gas Group Ltd
Greater Manchester Combined Authority
The Health and Safety Executive
High Peak Borough Council
Historic England
Leicestershire County Council
NATS Safeguarding
National Grid
Natural England
NHS England
Office of the Police and Crime Commissioner
Oldham Metropolitan Borough Council
Peak District National Park
Public Health England
Royal Mail
SGN
Stockport Metropolitan Borough Council
Tameside Metropolitan Borough Council
Utility Assets Ltd
Wales and West Utilities

**From:** [Heyworth, Gill](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Cc:** [Castle, Paul](#); [Wilson, Ian](#); [Shields, Chris](#); [Gardham, James](#); [Beddoes, Ann](#)  
**Subject:** Transpennine Upgrade - BMBC Response to EIA Scoping Document  
**Date:** 06 December 2017 11:09:37

---

Dear Dr Hunt

Further to the invitation to comment on the above, please find below Barnsley MBC's comments:

There is concern that there is no mention of the air quality impact beyond the immediate study area of the proposed scheme at Mottram etc and that it also considers neither the impact of the previously proposed "crawler" lane of the eastbound carriageway of the A628, west of the borough boundary, nor the previously proposed "dualling" of the A61 adjacent to junction 36 of the M1 motorway within the Barnsley borough.

At previous stakeholder meetings with Highways England, Barnsley MBC officers have consistently stressed the air quality issues at Langsett on the A616 (Langsett is an air quality management area due to raised traffic emissions causing exceedance of the annual mean and 1-hour mean objectives for nitrogen dioxide gas). Officers have stressed that improvements in Mottram will enhance the attractiveness of this trans-Pennine route to users, which may result in increased traffic. Consequently therefore there may be increased air quality impact in Langsett due to any increased traffic flow.

It is essential therefore that any subsequent EIA (including assessment of air quality impact) take account of the above, and that an assessment of air quality impact along the A616 and A628 in the Barnsley borough is undertaken.

Furthermore, there may also be noise impact, which would require a similar assessment in the Barnsley borough.

I hope the above is of help.

Kind regards

Gill

**Gill Heyworth**

Acting Strategic Transportation Manager  
Barnsley MBC

Tel: 01226 772039

\*\*\* Barnsley MBC Disclaimer:

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The Coal  
Authority



INVESTOR IN PEOPLE



RTPI  
Learning Partner

200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the Attention of: Dr Richard Hunt - Senior EIA and Land Rights Advisor

**[By Email: [Trans-PennineUpgradeProgramme@pins.gsi.gov.uk](mailto:Trans-PennineUpgradeProgramme@pins.gsi.gov.uk)]**

5 December 2017

Dear Dr Hunt

**SCOPING OPINION: TR010034-000004**

**Application by Highways England (the Applicant) for an Order granting Development Consent for the Trans-Pennine Upgrade Programme (the Proposed Development) Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested; Trans-pennine Upgrade Programme**

Thank you for your consultation letter of 9 November 2017 seeking the views of The Coal Authority on the EIA Opinion for the above development proposal.

The Coal Authority is a non-departmental public body sponsored by the Department for Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

**The Coal Authority Response:**

The proposed EIA development is located within the defined Development High Risk Area; the site has therefore been subject to past coal mining activity.

In accordance with the agreed risk-based approach to development management in Development High Risk Areas, past coal mining activities within the site should be fully considered as part of the Environmental Statement (ES); this should take the form of a risk assessment, together with any necessary mitigation measures.

The Coal Authority notes the Environmental Impact Assessment Scoping Report, Section 5.9.1 of which acknowledges coal mining legacy and that the anticipated structure and content of the ES will include a chapter on 'Geology and Soils.' Accordingly, and whilst not specifically targeted toward coal mining legacy, The Coal Authority welcomes the

commitment to undertake investigations to determine ground conditions, the resulting report of which may be considered to constitute the equivalent of a Coal Mining Risk Assessment to meet the requirements of the National Planning Policy Framework, paragraphs 120-121. The Coal Authority considers that the proposed site layout should be informed by any coal mining legacy features associated with past surface mining operations (i.e. mine entries.)

### Consideration of Coal Mining Issues in the ES

There are a number of coal mining legacy issues that can potentially pose a risk to new development and therefore should be considered as part of an Environmental Statement for development proposals within coalfield areas:

- The location and stability of abandoned mine entries
- The extent and stability of shallow mine workings
- Outcropping coal seams and unrecorded mine workings
- Hydrogeology, minewater and minegas

In addition, consideration should be afforded as part of development proposals and the ES to the following:

- If surface coal resources are present, whether prior extraction of the mineral resource is practicable and viable
- Whether Coal Authority permission is required to intersect, enter, or disturb any coal or coal workings during site investigation or development work

### Coal Mining Information

Information on these issues can be obtained from The Coal Authority's Property Search Services Team (Tel: 0845 762 6848 or via The Coal Authority's [website](#)) or book an appointment to visit The Coal Authority's Mining Records Centre in Mansfield to view our mining information (Tel: 01623 637 233).

The Coal Mining Risk Assessment should be prepared by a "competent body". Links to the relevant professional institutions of competent bodies can be found at:

<https://www.gov.uk/planning-applications-coal-mining-risk-assessments>

Guidance on how to produce a Coal Mining Risk Assessment and a template which the "competent body" can utilise is also contained at:

<https://www.gov.uk/planning-applications-coal-mining-risk-assessments>

Building over or within the influencing distance of a mine entry (shaft or adit) can be dangerous and has the potential for significant risks to both the development and the occupiers if not undertaken appropriately. The Coal Authority would draw your attention to our adopted policy regarding new development and mine entries:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>



In accordance with our consultation requirements, we look forward to receiving the planning application and Environmental Statement for comment in due course.

I trust this is acceptable, please do not hesitate to contact me if you require any additional information or would like to discuss this matter further.

Yours sincerely

*Chris MacArthur*

**Chris MacArthur** *B.Sc.(Hons), DipTP, MRTPI*  
**Planning Liaison Manager**

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available coal mining data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

**From:** [Clarke, Paul](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation - FAO Head of Planning  
**Date:** 13 November 2017 11:13:16  
**Attachments:** [image001.png](#)  
[Letter to stat cons Scoping & Reg 11 Notification.pdf](#)

---

Dear Sir – this proposal is some 67km from Derby and I am unsure why I have been consulted. You might wish to consult Derbyshire County Council whose boundary is much closer to this site.

Regards  
Paul

**Paul Clarke** | Head of Planning | Communities and Place | Derby City Council, The Council House, Corporation Street, Derby, DE1 2FS | Telephone 01332 641642 | Minicom 01332 340666 | [www.derby.gov.uk](http://www.derby.gov.uk)

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**From:** Trans-Pennine Upgrade Programme [<mailto:Trans-PennineUpgradeProgramme@pins.gsi.gov.uk>]  
**Sent:** 09 November 2017 12:04  
**Subject:** TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation - FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Trans Pennine Upgrade Programme.

Please note the deadline for consultation responses is **7 December 2017**, and is a statutory requirement that cannot be extended.

Kind regards,

Dr Richard Hunt

**From:** [Steven Buffery \(Economy Transport and Environment\)](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** Trans-Pennine Upgrade Programme - EIA Scoping Report  
**Date:** 06 December 2017 17:00:35

---

**For the attention of Richard Hunt**

-  
Dear Richard,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations)  
- Regulations 10 and 11**

**Application by Highways England (the Applicant) for an Order granting Development Consent for the Trans-Pennine Upgrade Programme (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested**

Thank you for consulting Derbyshire County Council (DCC) on the above Scoping Report. The comments below are DCC's Officer technical comments on the Scoping Report.

Overall, it is considered that the Scope of the Environmental Impact Assessment (EIA) will cover most of the salient areas where environmental impacts could potentially occur arising from the proposal(s), except where highlighted below.

In terms of consultation, it is welcomed that Section 4.2.1 indicates that a Preliminary Environmental Information Report (PEIR) will be published in the first quarter of 2018 and consulted upon as part of the statutory consultation required Under Section 42 of the Planning Act. The PEIR would hopefully provide DCC and other stakeholders with an analysis of the likely broad environmental impacts of the scheme, pending completion of the full Environment Statement.

It is also welcomed that Section 4.2.4 indicates that Statements of Common Ground (SoCC) would also be prepared in advance of submitting the application for Development Consent to confirm agreement with as many of the aspects of the Environment Statement as possible. This would be likely to save significant amounts of time and resources during the examination process.

Highways Impacts

On the basis of the Scoping Report it would appear that the EIA will provide little in the way of any actual information about the traffic impacts of the scheme(s) arising from changes in travel patterns that could potentially occur on Derbyshire's roads. Section 5.2.1 discusses the Study Area adding that the study area will be defined by the changes in traffic flows on the local road network. The Scope of the EIA sets out the criteria to be used to identify roads likely to be affected where the daily traffic flows will change by 1,000 Annual Average Daily Traffic (AADT) or more; or where daily average speeds will change by 10 kilometre/hour or more; or peak hour speed will change by 20 kilometre/hour or more. However, it is considered that if this becomes the basis upon which information about changes in traffic flow is selectively going to be provided, there could be roads in Derbyshire where a lower threshold may be more appropriate. Therefore, in the absence of any information regarding traffic impacts, DCC would reserve its position with regard to the threshold for the assessment of traffic impact arising from the scheme.

## Climate Change

Having assessed Section 5.11 on Climate in detail, it is considered that in Section 5.11.2 Baseline Conditions, it should be stated that the UK Climate Projections for 2018 will be used if published at the time of the actual assessment.

## Socio-Economic Impacts

-

It is of concern that the Scoping Report does not appear to make any reference to the potential socio-economic impacts of the proposed highways schemes. DCC would be particularly interested to gain a better understanding of the potential economic and regeneration benefits of the schemes, both direct and indirect, for the local economy in High Peak Borough as a consequence of the construction and implementation of the highway schemes. This could include an assessment of the number of jobs created in the construction phase and potential multiplier effects for the local economy of the area, such as through local supply chains. DCC would recommend that this is a topic which should be included in the Environment Statement or if not, it should be included in other evidence base studies, which are to be prepared to support the Development Consent Order application.

## Materials

Section 5.10.2 sets out details of the Baseline Conditions for the assessment of the use of materials and the generation of waste. Part 5 refers to the fact that if a significant amount of secondary aggregates is required to facilitate the construction of the scheme, the Derbyshire County Council Minerals Local Plan and Greater Manchester Minerals Local Plan would be reviewed to ascertain if consistent baseline data for secondary aggregates could be obtained to form the basis of the quantitative assessment. It is important to note that the Derby and Derbyshire Minerals Local Plan is currently being reviewed, for which a Draft Derby and Derbyshire Minerals Local Plan will be published early in the new year. It is therefore recommended that Highways England or their consultants contact DCC to discuss this issue further as the Draft Local Plan will contain more up-to-date data and information on secondary aggregates than the previous adopted Local Plan.

-

## Cumulative Impacts

Section 6.2 of the Scoping Report considers the scope of the cumulative impact implications that will be covered in the Environment Statement. It noted that a Zone of Influence has been defined for the highways schemes based on several topic areas including biodiversity, geology and soils, noise and vibration, people and communities, road drainage and the water environment, climate and health, which is welcomed in principle. However, the outputs of the Transport Modelling work for the schemes have yet to be finalised and it will be important that the extent of the Zones of Influence are informed by the final outputs of the Transport Modelling work.

It is also noted that in Table 6.2, three planning applications for larger-scale proposed residential and mixed-use developments, which have either been approved or are pending a decision, have been identified as the basis for consideration of the assessment of cumulative impacts – two in High Peak Borough and one in Tameside Borough. DCC's Officers attended a presentation on the Trans-Pennine Upgrade Programme hosted by Highways England in Manchester on 22 November 2017, when the Scoping Report was discussed. DCC's Officer who attended the meeting raised the issue of cumulative impacts and the range of schemes that would be included in the cumulative

impact assessment and whether the three schemes identified in Table 6.2 had been agreed as the most relevant with the respective local planning authorities. However, Highways England's representative indicated that that no consultation had taken place with the respective local planning authorities on this issue. Accordingly, therefore, DCC would recommend that Highways England liaises with the respective local planning authorities at an early stage in preparing the Environment Statement to agree which proposed development schemes should be included in the cumulative impact assessment.

I hope this is of assistance in agreeing the final scope of the Environment Statement.

Regards

Steve

**Steve Buffery | Team Leader**

**Policy and Monitoring**

**Economy, Transport and Environment | Derbyshire County Council**

**County Hall, Matlock, Derbyshire, DE4 3AG**

**01629 539808**

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Dr Richard Hunt - Senior EIA Adviser  
The Planning Inspectorate  
Major Casework Directorate  
Temple Quay House (2 The Square)  
Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** SO/2017/117737/01-L01  
**Your ref:** TR010034-000004  
**Date:** 05 December 2017

Dear Mr Hunt

**TRANS-PENNINE UPGRADE PROGRAMME ENVIRONMENTAL IMPACT  
ASSESSMENT SCOPING REPORT  
A57 MOTTRAM MOOR LINK ROAD SCHEME**

Thank you for consulting the Environment Agency on the Scoping report for the proposed EIA.

We have reviewed the Environmental Impact Assessment Scoping Report, dated November 2017. We are satisfied that the scope of work outlined in the EIA will be appropriate for the management of the risks to controlled waters.

We would provide the following comments for information and to assist the applicant in preparing the EIA:-

**Flood Risk**

The appointed consultant has already engaged our area Partnership and Strategic Overview team to discuss the Flood Risk Assessment (FRA) requirements and proposed river modelling work. These discussions are ongoing.

**Water Framework Directive**

1. A Water Framework Directive (WFD) assessment will be required as part of this application and we would recommend that the scope for this is agreed at an early stage (see background note 1, below). This will allow the applicant to identify the combined survey and monitoring requirements for both EIA and WFD assessment purposes, reduce duplication of effort and identify data gaps.

2. High level advice for undertaking WFD assessments for Nationally Significant Infrastructure Projects has been published on the Planning Inspectorate's website, Advice Note 18 > [https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2017/06/advice\\_note\\_18.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2017/06/advice_note_18.pdf)
3. We would encourage the applicant to seek the views of the Environment Agency during the pre-application stage to ensure the scope for the WFD assessment is appropriate, and to agree how the WFD assessment will be presented (for example, this could form part of the EIA).
4. It should be noted that the Water Framework Directive applies to all surface waters, regardless of whether it is defined as 'Main River' or otherwise.

### Background note 1

The Water Framework Directive (WFD) is a European directive that imposes legal requirements to protect and improve the water environment. In addition, nature conservation legislation, such as the European Habitats and Birds Directives, impose legal requirements to conserve key species and habitats. Wider environmental legislation provides protection for landscape, heritage and fisheries. Physical works that occur in and around rivers could potentially conflict with these legal requirements and/or cause harm to the water environment. The Environment Agency must secure compliance with the requirements of the WFD and meet its other environmental duties when undertaking physical works in rivers and issuing consents/licences for others to do so. Other public bodies with operational and/or regulatory responsibilities, such as Lead Local Flood Authorities and Local Planning Authorities, must have regard to the River Basin Management Plans when undertaking works and issuing consents to others. Other public bodies will have their own wider environmental duties.

### Drainage

Section 5.8 of the scoping report identifies the need for a Hydrogeological Risk Assessment (HRA) to be undertaken to inform the design of the road drainage strategy. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

### Biodiversity/Ecology

We would expect that any watercourse that will be impacted by the proposed scheme (either during construction or afterwards) would be subject to a River Corridor Survey. The results of this survey should then be used to ensure no net loss to the aquatic/riparian environment, either in length/quantity and quality e.g. replacement of a

natural watercourse with a trapezoidal straight drainage ditch.

We would also wish to see an 8 metre undisturbed buffer zone alongside watercourses and that this buffer zone will be protected during development.

Buffer zones to watercourses are required for the following purposes:

- (i) to allow the watercourse to undergo natural processes of erosion and deposition, and associated changes in alignment and bank profile, without the need for artificial bank protection works and the associated destruction of natural bank habitat;
- (ii) to provide for the terrestrial life stages of aquatic insects, for nesting of water-related bird species, and for bank dwelling small mammals;
- (iii) to provide a "wildlife corridor" bringing more general benefits by linking a number of habitats and affording species a wider and therefore more robust and sustainable range of linked habitats;
- (iv) to allow for the maintenance of a zone of natural character with vegetation that gives rise to a range of conditions of light and shade in the watercourse itself. This mix of conditions encourages proliferation of a wide range of aquatic species, including fish;
- (v) to reduce the risk of accidental pollution from run-off.

We would also expect that any proposed bridge crossing of the Etherow will be of a clear spanning structure with abutments set well back from the rivers edge. This will maintain a continuous buffer strip and corridor that is available for colonisation and passage by wildlife and also reduce the risk of pollution from run-off.

A permit under the Environmental Permitting (England and Wales) Regulations 2010 would be required from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the River Etherow, designated 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now [excluded](#) or [exempt](#). A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

## **Ground Investigation**

Section 5.9 of the Scoping Report outlines that a ground investigation will be undertaken to inform the scheme design, to determine the ground and groundwater conditions.

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the [Environment Agency Guiding principles for land contamination](#) for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
4. Refer to the [contaminated land](#) pages on GOV.UK for more information.



Should the applicant wish to discuss our comments in more detail or require further advice, we can offer a chargeable service. The applicant should be advised to contact us at [spplanning.rfh@environment-agency.gov.uk](mailto:spplanning.rfh@environment-agency.gov.uk) if this would be useful.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

**Mr CHRIS WARING**  
**Planning Specialist Sustainable Places**

Direct dial 02030250486

Direct e-mail [chris.waring@environment-agency.gov.uk](mailto:chris.waring@environment-agency.gov.uk)

**From:** [Alison Cleland](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** Your Reference: TR010034-000004. Our Reference: PE133392. Plant Not Affected Notice from ES Pipelines  
**Date:** 22 November 2017 14:29:15

---

The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

22 November 2017

Reference: TR010034-000004

Dear Sir/Madam,

Thank you for your recent plant enquiry at (TR010034-000004).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

**Important Notice**

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: [PlantResponses@espipelines.com](mailto:PlantResponses@espipelines.com)

Yours faithfully,

Alan Slee  
**Operations Manager**



**From:** [Enquiries](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** Automatic reply: TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Consultation  
**Date:** 09 November 2017 12:04:43

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**From:** [Dave.Adams2@hse.gov.uk](mailto:Dave.Adams2@hse.gov.uk) on behalf of [NSIP.Applications@hse.gov.uk](mailto:NSIP.Applications@hse.gov.uk)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** NSIP - Proposed Trans Pennine Upgrade Scheme - EIA Scoping Consultation, HSE Response  
**Date:** 06 December 2017 12:15:18  
**Attachments:** [NSIP - Proposed Trans Pennine Upgrade Scheme - EIA Scoping Consultation, HSE PDF Response.PDF](#)

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Dear Dr Hunt,

Thank you for your letter of 9<sup>th</sup> November 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the information attached is likely to be useful to the applicant.

Kind regards,

Dave Adams

**Dave.MHPD.Adams**

**Land Use Planning Policy, Chemicals, Explosives & Microbiological Hazards Division, Health and Safety Executive.**

**Desk 76, 2.2, Redgrave Court, Merton Road, Bootle, Merseyside L20 7HS**

**+44 (0) 20 3028 3408 [dave.mhpd.adams@hse.gov.uk](mailto:dave.mhpd.adams@hse.gov.uk)**

[www.hse.gov.uk](http://www.hse.gov.uk) | <http://hse.gov.uk/landuseplanning>

---

CEMHD Policy - Land Use Planning  
NSIP Consultations  
Building 2.2, Redgrave Court  
Merton Road, Bootle  
Merseyside, L20 7HS

Your ref: TR010034  
Our ref: 4.2.1.6170

HSE email: [NSIP.applications@hse.gov.uk](mailto:NSIP.applications@hse.gov.uk)

FAO Dr Richard Hunt  
The Planning Inspectorate  
Temple Quay House  
Temple Quay,  
Bristol  
BS1 6PN

Dear Dr Hunt

06 December 2017

**PROPOSED TRANS PENNINE UPGRADE SCHEME (the project)  
PROPOSAL BY HIGHWAYS ENGLAND (the applicant)  
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 9<sup>th</sup> November 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

**HSE's land use planning advice**

Will the proposed development fall within any of HSE's consultation distances?

With reference to the extent of the scheme in drawings contained in document 'Trans-Pennine Upgrade Programme, Environmental Impact Assessment, Scoping Report, November 2017, Highways England', there are currently no Major Hazard Installations in the vicinity of the proposed scheme.

There are currently no Major Accident Hazard Pipeline(s) (MAHP) in the vicinity of the proposed scheme.

Although there are currently no Major Hazard Installations or Major Accident Hazard Pipeline(s) (MAHP) in the vicinity of the proposed scheme, should a Hazardous Substances Consent [The Planning (hazardous Substances) (England) 2015 Regulations (as amended)] be granted prior to the determination of the present application, and/or HSE receives a notification under the Pipeline Safety Regulations 1996 then HSE reserves the right to revise its advice.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

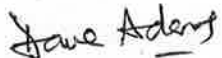
**Electrical Safety**

No comment, from a planning perspective.

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)  
NSIP Consultations  
2.2 Redgrave Court  
Merton Road  
Bootle, Merseyside  
L20 7HS

Yours sincerely,

A handwritten signature in black ink that reads "Dave Adams". The signature is written in a cursive style with a horizontal line under the name.

Dave Adams  
CEMHD4 Policy



# High Peak Borough Council

*working for our community*

7<sup>th</sup> December 2017

My ref:

Your ref:

Planning Inspectorate  
3D Eagle Wing  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

Dear Sir or Madam,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Highways England (the Applicant) for an Order granting Development Consent for the Trans-Pennine Upgrade Programme (the Proposed Development)**

Thank you for your letter inviting comments on the above. I have the following comments to make regarding the proposed scoping methodology.

General

Section 1.1.5;

\*\*It is not entirely clear why potential pre –mitigation impacts are not / were not to be presented in this Report. This would benefit greatly the understanding of the proposals presented in the document.

This decision contradicts Highways England's Scoping Report structure, published in June 2017. The argument put forward is to ensure compliance with the DMRB manual, which also published by the Highways Agency. Given that the two documents are intrinsically linked, the former document would appear to have not been adopted, and one assumes this approach is consistent across the county. It is also worth noting that the decision to adopt this approach appears to have been taken by the publisher of this report (Highways, England) in discussion with Highways England.

Section 3.2.27; *this may not be applicable for this consolation but I feel it is worth noting - feel free to exclude*

Given the information preceding this section, the arguments presented against the "brown option" in this section are not appropriately justified (referenced). No information is presented (or referenced) supporting the apparent "dis- benefits" of the Brown Option, which included: bringing significantly more traffic to the area, increased air quality and noise issues. Possibly this reflects in a shift in the argument from human receptors (local authority) to the impacts on the wider peak park environment because the argument presented does not fit the former.



## 5.2 Air Quality

The proposed methodologies are generally appropriate but the following comments are made:

### General

Minimal discussion for Particulate Matter (beyond regional assessment), it is assumed that this will still be in the detailed assessment (page 22) in this should be included in local assessment proposals (modelling).

#### 5.2.1 Study Area

Whilst the requirements of DMRB (3.12), listed here are important they require a robust estimate of future traffic flow. The assessment should ensure that it captures the issue of potential compounding queuing traffic, particularly where properties are close to the road e.g. An area where peak traffic flow drops from say 20km to 5km, in an area where properties are close to the road and are already close to the AQ objective, could theoretically be missed.

#### 5.2.2 Baseline Conditions

(5) High Peak has not seen the details of the monitoring conducted in the district. Is it proposed (or have) these monitoring location been continued, through into 2017. This could be included as an appendix to this report.

(6) High Peak has not seen the PCF Stage 2 AQ assessment details outlying the location of the sensitive receptors. This could be included as an appendix

#### 5.2.3 & 5.2.4

Proposals are very general but appropriate, general comments cannot be made as no specific potential impacts are presented\*\*.

#### 5.2.5

The proposed assessment methodology (ADMS- Roads) is considered appropriate. The assessment should include particulate matter (not specifically noted in proposal).

## 5.7 Noise Impacts

The proposed assessment of noise impacts and mitigation are considered in section 5.7. In consideration of amenity impacts as set out paragraphs 11.1.34 to 11.1.40. The assessment of the construction phase is to be undertaken in accordance with the following British Standards (BS) BS 5228-1:2009+A1:2014 and BS 5228-2:2009+A1:2014, Codes of practice for noise and vibration control on construction and open sites, noise and vibration. The operational impact of the proposed development will be considered under the Design Manual for Roads and Bridges -Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques Part 7 HD 213/11 – Revision 1 - Noise and Vibration (The Highways Agency). The scoped out impacts are set out in table 7.2.

The proposals are considered appropriate

## 5.9 Geology and Soils

The theory of the proposals are essentially fine but the should be structure in accordance with approach set out (noted in 5.9.5) in the Environment Agency's Model Procedures for the management of contaminated land ( CLR 11 ). This should start with a conceptual site model of the route and proposed assessments / site history (here called baseline) should then inform what sampling should be undertaken during the risk assessment etc.

I trust that the above comments are of assistance.

Yours sincerely



X *B.J. Haywood*

---

Signed by: Ben Haywood  
Operations Manager – Development Services



Historic England

EAST MIDLANDS OFFICE

Mr Richard Hunt  
The Planning Inspectorate  
3D Eagle Wing  
Temple Quay House  
2 The square  
Bristol  
BS1 6PN

Direct Dial: 01604 735460

Our ref: PL00222682

5 December 2017

Dear Mr Hunt

**RE: TRANS-PENNINE UPGRADE PROGRAMME (A57) - SA SCOPING OPINION**

Thank you for the consultation on the above Scoping Report for the associated NSIP project. Our response is set out with general overview comments and then more specific comments on cultural heritage, highlighting particular elements in respect of the scoping report.

**General Comments**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

The Trans-pennine Upgrade Programme could, potentially, have an impact upon designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk) <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.



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We would strongly recommend that you involve the Conservation Officers and the archaeological advisors at the relevant local authorities for the project in the development of this assessment. They are best placed to advise on local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

### **Comments in respect of Cultural Heritage**

Historic England would wish to make the following comments in respect of the scoping exercise and cultural heritage:

#### **Section 5.3 - Cultural Heritage**

The existing information is acknowledged and it is noted that the HER has been consulted. It is recommended that expert advice from local curators is sought throughout the process and which may assist with informing the proposed walkover survey, and it is noted that such dialogue is included within the assessment methodology at 5.3.5.

Whilst archaeological remains and non-designated heritage assets are noted within 5.3.5 there is no provision for assessment of other heritage assets which are of national importance such as Conservation Areas and Listed Buildings or Historic Landscape Character. Heritage Impact Assessment work may be required to inform design in respect of these assets and it is recommended that appropriate wording relating to this is included in the Scoping Report to ensure that these matters are explored sufficiently and appropriately at EIA stage. Such work could be linked with ZVI work proposed in Section 5.5 Landscape and Townscape Effects.

There are key synergistic links between Sections 5.3 Cultural Heritage and 5.5 Landscape and Townscape of the Scoping Report. It is recommended that these be explored to ensure that relevant information for both elements can be captured during the visual surveys and baseline photography (summer and winter) proposed for 5.5 Landscape and Townscape to inform the EIA as it moves forward. For example, ZVI work proposed in Section 5.5. Landscape and Townscape Effects could assist with HIA work for specific heritage assets such as the GII\* church.

In respect of 5.3.3, Design, Mitigation and Enhancement Measures, the report sets out that 'it may not be possible to avoid or mitigate all impacts'. Heritage Impact Assessment work as part of the ES process, for particular sites/areas where highlighted through DBA work, would assist with informing appropriate measures ensuring that loss or compensatory measures are a last resort.



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## Church of St Michael and All Angels GII\*

We note that the two Grade II\* listed buildings are proposed to be scoped out of the assessment. There is no concern about scoping out The Cross, but we recommend that the Grade II\* Church of St Michael and All Angels is included in the assessment. The Church has a more imposing presence in the landscape and whilst the nearest part of the proposed bypass is some 500m or so away, it would be prudent for the ES to confirm that there is, in fact, no impact on the Church's setting by providing views to and from it in the visualisations proposed for Section 5.5 Landscape and Townscape.

## Historic Landscape Characterisation

We also note that it is proposed to scope out Historic Landscape Characterisation (HLC) from the assessment and can advise we do not agree with this approach. It is noted that the scope has been set out in line with DMRB requirements but we would submit that the document is rather dated and currently undergoing a major revision as part of the current Roads Investment Strategy which Historic England will be commenting on at consultation stage.

In addition, the NSIP will be assessed against the Government's National Networks National Policy Statement (link below) which sets out that an applicant's assessment should include any significant effects during construction of the project and/or the significant effects of the completed development and its operation on landscape components and landscape character (including historic landscape characterisation) (Para.5.145):

([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/387223/npsnn-web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/387223/npsnn-web.pdf))

Furthermore, it is intrinsically linked to general landscape character which is proposed to be assessed in Section 5.5. The scoping report puts forward the view that modern interventions have been made to the landscape. However, whilst the local landscape has seen substantial modern interventions it still *has* historic landscape character parts of which relate to the present day setting of the scheduled Melandra fort and other high value heritage assets.

Without some appreciation of impacts upon the significance of the local historic landscape character the opportunity for that analysis to inform the design and detailing of route options and landscaping / planting / lighting etc is likely to be missed.

As such, Historic England recommends that Historic Landscape Character be included in the assessment and we would be pleased to discuss this further with the applicant in due course.



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## Buried archaeology

Historic England is of the view that the proposed scope of the assessment is rather limited and that moving forward the SA should consider additional factors.

For example, in Para.5.3.2 of the Baseline conditions existing information the earliest phase of human activity noted is the Bronze Age. However, our desk top search indicates there is also known Mesolithic activity in the area which would need to be taken into consideration and addressed appropriately in the SA. Of particular relevance is the Mesolithic activity on the south side of the river in the vicinity of the Melandra fort and within the 500m boundary set for non-designated heritage assets:

[http://www.pastscape.org.uk/hob.aspx?hob\\_id=306352](http://www.pastscape.org.uk/hob.aspx?hob_id=306352)

In terms of additional information required to inform the ES (Para.5.3.2), given that the impacts of the proposed development on any sub-surface archaeological remains are likely to be substantial, it would be desirable for the acquisition of additional information to involve more than a heritage walkover survey.

Where ground investigations are taking place (i.e. as part of the study of Geology and Soils, p. 43) there is an opportunity to integrate the study and consider cultural heritage, i.e. ensure that geotechnical boreholes are undertaken with the involvement of a geoarchaeologist to enable an assessment of deposits across the route. This would considerably assist in the quest to gather data on currently unknown undesignated sub-surface archaeological remains by enhancing knowledge of the type of deposits, burial environments and states of preservation likely to be encountered along the route (e.g. are there any palaeochannels? What is the potential for palaeoenvironmental evidence of human activity in the area?).

The geoarchaeological investigations would also prove a valuable tool in allowing us to assess which geophysical survey techniques would be most effective on different parts of the landscape. If there is no suitable geotechnical programme planned in areas of high potential and impact - such as in the vicinity of the River Etherow - then it would be worth considering a standalone programme of geoarchaeological investigations. Historic England Science Advisors would be able to discuss this further with the applicant as the project progresses.

### Design, Mitigation and Enhancement Measure (Para. 5.3.3)

*“Potential mitigation measures may also include intrusive and nonintrusive investigations. These could include, but not be restricted to, **geophysics surveys, trial trenching and archaeological evaluation.***

In the preceding paragraph it was noted that geophysical surveys should occur after



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geoarchaeological investigations as geophysics may not always be the most appropriate survey technique, and other methods (such as test pitting) may be more likely to reveal the nature and extent of archaeological remains.

However, Historic England's view is that archaeological geophysical survey should form part of the additional information informing the ES, rather than solely being part of the mitigation as set out in the scoping report at present.

Para 5.3.6 'Assessment Assumptions and Limitations' sets out that 'the majority of such sites have never been subject to archaeological investigation to modern standards. Whilst this may often be the case, within the study area there have been a number of projects that provide a considerable base of archaeological knowledge to a relatively high contemporary standard e.g. the test pits excavated by the Tameside Archaeological Survey around Mottram in Longdendale and the archaeological studies and surveys carried out in association with previous iterations of this road scheme. Therefore the ES offers a considerable opportunity to integrate and build upon previous work, producing an ES of substance that effectively and efficiently identifies the significance of designated and non-designated buried archaeology.

Finally, in respect of buried archaeology we would recommend that the Historic England 'Preserving Archaeological Remains' advice is taken into account as part of the ES work:

<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

### **Significance criteria - Appendix A**

The significance criteria does not set out the assessment in respect of heritage asset significance particularly well. We acknowledge the fact that there will always be a difficulty in transference of language between NPS/NPPF in respect of 'significant effects' and 'significance' but we consider this does need to be set out appropriately in order for there to be meaningful evaluation of the impact of the proposal on the significance of heritage assets and the historic environment.

For example, Table **11-7** needs to include reference to the *significance* of the elements of historic landscape character otherwise one cannot discern which changes to focus upon. This shortcoming is more striking in tables **11-5 and 11-6** (archaeological assets and historic buildings) which both also talk about change *to* elements rather than impacts upon their *significance* - this is reductive in that it shortcuts from an intervention in the landscape directly to an effect upon a material element / setting. To be able to understand the impact of a change as more or less harmful / beneficial one needs to frame that impact in terms of the effect upon the *significance* of the asset.



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In **Table 11-8** the magnitude of impact versus value is potentially suitable, but will only work if the magnitude of impact axis is informed by a sound understanding of impact upon *significance* in **tables 11-5, 11-6, 11. 7** (significance being what makes an asset special or interesting) only then can we use table **11-8** to set those impacts against the relative value (importance) of the assets concerned.

Historic England recommends that the applicant revisit the National Policy Statement and NPPF to ensure consistency in the criteria approach to significance. The applicant may also wish to refer to the following Historic England documents in their considerations:

- Good Practice Advice Note 2 Managing Significance in Decision Taking in the Historic Environment (<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>)
- Good Practice Advice Note 3 Setting and Views (<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>)

## Summary

As set out above, there are four key areas of concern in respect of the scoping report. Firstly, provision should be made in the ES for consideration of Conservation Areas, Listed Buildings and HLC which is not set out at present in Para 5.3.5. Secondly, Historic England does not agree that the GII\* listed church or HLC should be scoped out of the assessment for the reasons set out above. Thirdly, we would expect that much more scope would be made for buried archaeology within the ES moving forward. Finally, we would expect a more robust and sound approach to the understanding and assessment of the significance of cultural heritage within Appendix A than that which is currently put forward.

We look forward to engaging with PINS and Highways England further as the project progresses and would be happy to discuss any of the points raised above with the applicant in due course.

Yours sincerely,



Rosamund Worrall  
Historic Environment Planning Adviser  
Rosamund.Worrall@HistoricEngland.org.uk



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Historic England

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*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*



**From:** [John R Wright](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Cc:** [HDC](#)  
**Subject:** Trans-Pennine Upgrade Programme -Scoping consultation  
**Date:** 10 November 2017 09:38:29

---

Dear Sirs

I refer to your letter dated 9<sup>th</sup> November 2017 consulting Leicestershire County Council on the information to be provided in the Environmental Statement. I confirm on behalf of the Council that it does not have any comments to make.

John Wright

Team Manager Planning  
Planning Historic and Natural Environment  
Chief Executives Department  
Leicestershire County Council  
County Hall  
Glenfield  
Leicester  
LE3 8RA  
e-mail: [john.wright@leics.gov.uk](mailto:john.wright@leics.gov.uk)  
Tel: 01163057041

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**From:** [AULD, Alasdair E](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Cc:** [NATS Safeguarding](#)  
**Subject:** RE: SG25400 TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation  
**Date:** 09 November 2017 15:37:04

---

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully,

Alasdair Auld  
On behalf of NERL Safeguarding Office

---

**From:** Trans-Pennine Upgrade Programme [mailto:Trans-PennineUpgradeProgramme@pins.gsi.gov.uk]  
**Sent:** 09 November 2017 12:02  
**Subject:** SG25400 TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files

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Dear Sir/Madam

Please see attached correspondence on the proposed Trans Pennine Upgrade Programme.

Please note the deadline for consultation responses is **7 December 2017**, and is a statutory requirement that cannot be extended.

Kind regards,

Dr Richard Hunt

Senior EIA and Land Rights Advisor

Major Applications and Plans, The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol, BS1 6PN

Twitter: @PINSgov

**Land and Acquisitions**  
Spencer Jefferies  
Development Liaison Officer  
Network management  
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SUBMITTED ELECTRONICALLY:  
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[www.nationalgrid.com](http://www.nationalgrid.com)

07 December 2017

Dear Sir/Madam

**APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE TRANS-PENNINE UPGRADE PROGRAMME (THE PROPOSED DEVELOPMENT)**

**SCOPING CONSULTATION AND NOTIFICATION OF THE APPLICANT'S CONTACT DETAILS AND DUTY TO MAKE AVAILABLE INFORMATION TO THE APPLICANT IF REQUESTED**

This is a response on behalf of National Grid Electricity Transmission PLC (NGET)

I refer to your letter dated 9<sup>th</sup> November 2017 regarding the future Order. NGET wish to express their interest in further consultation while the impact on our assets is being assessed.

In respect of existing NGET infrastructure, NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.

**Electricity Transmission Assets in the vicinity of the proposed Order boundary:**

- ZZC 400kv over - head line route (BREDBURY – STALYBRIDGE)
- 4ZO 400kV over-head line route (STALYBRIDGE - THORPE MARSH)

**Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGET's apparatus, NGET will require appropriate protection and further discussion on the impact to its apparatus and rights.**

Please see relevant guidance for working near NGET assets below.

**Specific Comments – Electricity Infrastructure:**

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004)” and also shown in the following National Grid Document:  
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=6169>
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

To view the SSW22 Document, please use the link below:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>

To view the National Grid Policy's for our Sense of Place Document. Please use the link below:

<http://www2.nationalgrid.com/uk/services/land-and-development/publications/>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further information in relation to in proximity to National Grid's apparatus can be found at:

<http://www2.nationalgrid.com/UK/Safety/Library/>

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely



**Spencer Jefferies**  
**Development Liaison Officer, Land and Acquisitions.**

Date: 07 December 2017  
Our ref: 231032  
Your ref: TR010034-000004



Dr Richard Hunt  
The Planning Inspectorate  
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**BY EMAIL ONLY**

Dear Dr Hunt

**Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011):** TR010034 - Trans-Pennine Upgrade Scheme - EIA Scoping Notification and Consultation

**Location:** Mottram Moor Link Road Scheme - Trans Pennine

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 09 November 2017

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Andy Stubbs on 02080261978. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Andy Stubbs – Lead Adviser  
East Midlands Sustainable Development

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<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations 2017'). In addition paragraph 118 of the National Planning Policy Framework requires

that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Requirements are set out within Regulations 62 and 63 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 62 and 63 are commonly referred to as the 'Habitats Regulations Assessment' process.

The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

The development site is in proximity to the following designated nature conservation sites:

- South Pennine Moors Special Area of Conservation
- Peak District Moors (South Pennine Moors Phase 1) Special Protection Area
- Dark Peak Site of Special Scientific Interest
- Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects
- Natura 2000 network site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

Staffordshire Wildlife Trust

Address: The Wolseley Centre, Wolseley Bridge, Stafford, ST17 0WT.

Tel: 01889 880100

Email: [info@staffs-wildlife.org.uk](mailto:info@staffs-wildlife.org.uk)

Derbyshire Wildlife Trust

Derbyshire Wildlife Trust, Sandy Hill, Main Street, Middleton, Matlock, Derbyshire, DE4 4LR

Tel: 01773 881188.

Email enquiries [enquiries@derbyshirewt.co.uk](mailto:enquiries@derbyshirewt.co.uk)



## **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## **2.6 Contacts for Local Records**

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

Greater Manchester Ecology Unit  
Council Offices  
Clarence Arcade  
Ashton-under-Lyne  
Tameside, OL6 7PT  
Tel: 0161 342 4409  
Email: [info@gmwildlife.org.uk](mailto:info@gmwildlife.org.uk)

Derbyshire Wildlife Trust also hold Local Biodiversity Records  
Telephone: 01773 881188  
or [dataenquiries@derbyshirewt.co.uk](mailto:dataenquiries@derbyshirewt.co.uk)

### **3. Designated Landscapes and Landscape Character**

#### **Nationally Designated Landscapes**

As the development site is within/adjacent to Peak District National Park, consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for Peak District National Park.

#### **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the

cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

### **Heritage Landscapes**

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

### **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby Pennine Bridleway National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

### **5. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

### **Soil and Agricultural Land Quality**

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see [www.magic.gov.uk](http://www.magic.gov.uk). Natural England Technical Information Note 049 - [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) also contains useful background information.

2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.
3. The Environmental Statement should provided details of how any adverse impacts on soils can be minimised. Further guidance is contained in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#).

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

## **6. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **7. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

## **8. Contribution to local environmental initiatives and priorities**

The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement,. Natural England would encourage the incorporation of GI into this development. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England [Green Infrastructure web pages](#).

## **9. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;

- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

**From:** [CONTACTUS, England \(NHS ENGLAND\)](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** Automatic reply: TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation  
**Date:** 09 November 2017 12:20:58

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In the meantime, the following information may be able to help you access information immediately.

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NHS England does not commission secondary care (with the exception of Specialised Services). This includes hospital care, NHS 111 services, mental health services, out-of-hours services and community services such as district nursing. These services are commissioned by Clinical Commissioning Groups (CCGs). If you need advice about accessing secondary care, you should contact your local CCG. You can find their contact details using the [service finder on the NHS Choices website](#).

You may also refer to the following links for further information about NHS England

<https://www.england.nhs.uk/about/>

<https://www.england.nhs.uk/ourwork/>

<https://www.england.nhs.uk/resources/>

<https://www.england.nhs.uk/commissioning/>

and <https://www.england.nhs.uk/contact-us> for details about the Customer Contact Centre, which also provides a number of FAQ's.

If you require medical attention, please contact your GP, call 111 or if you require urgent medical attention, please dial 999 or attend your local Accident and Emergency Department.

If, after receiving this automated response, you no longer think we can assist with your email, please reply to this email address stating '**NO FURTHER ACTION REQUIRED**' and we will not respond to your email.

Kind Regards

NHS England Customer Contact Centre team

\* Please note our normal working hours are 08:00 to 18:00 from Monday to Friday and we regret the delay in reply over the non-working hours.

\*\*\*\*\*

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**To:** [prvs=04825E1941=Trans-PennineUpgradeProgramme@pins.gsi.gov.uk](mailto:prvs=04825E1941=Trans-PennineUpgradeProgramme@pins.gsi.gov.uk)  
**Subject:** Automatic Reply - Office of the Police and Crime Commissioner for Derbyshire  
**Date:** 09 November 2017 12:01:49  
**Attachments:** [TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation.msg](#)

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Thank you for contacting the office of the Police and Crime Commissioner for Derbyshire. Our normal working hours are Monday to Thursday 9:00am to 5:00pm and Friday 9:00am to 4:30pm (excluding bank holidays).

If you are contacting us from the media, please contact our media partner, Better Times, on 01283 821012 who should be able to respond more quickly.

If you are contacting us to report a crime please note, we cannot take crime reports on this e-mail. Please call 999 in an emergency or call 101 if your report is not urgent.

Thanks again for contacting the Derbyshire OPCC.

**From:** [donotreply@oldham.gov.uk](mailto:donotreply@oldham.gov.uk)  
**To:** [prvs=04825E1941=Trans-PennineUpgradeProgramme@pins.gsi.gov.uk](mailto:prvs=04825E1941=Trans-PennineUpgradeProgramme@pins.gsi.gov.uk)  
**Subject:** Thank you  
**Date:** 09 November 2017 12:05:38

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Kind Regards,

Planning and Infrastructure

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**Peak District National Park Authority**

**Tel: 01629 816200**

E-mail: [customer.service@peakdistrict.gov.uk](mailto:customer.service@peakdistrict.gov.uk)

Web: [www.peakdistrict.gov.uk](http://www.peakdistrict.gov.uk)

Minicom: 01629 816319

Aldern House . Baslow Road . Bakewell . Derbyshire . DE45 1AE



**PEAK  
DISTRICT  
NATIONAL  
PARK**

Dr Richard Hunt  
Senior EIA and Land Rights Advisor  
on behalf of the Secretary of State  
The Planning Inspectorate  
3D Eagle Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Your ref: TR010034-000004

Our ref: PE\2017\ENQ\31398

Date: 7<sup>th</sup> December 2017

*Letter sent via e-mail*

Dear Dr Hunt

**Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11**

**Application by Highways England (the Applicant) for an Order granting Development Consent for the Trans-Pennine Upgrade Programme (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested**

Thank you for contacting the Peak District National Park Authority with regard to the scoping of the Trans Pennine Upgrade Programme Environmental Impact Assessment. We welcome the opportunity to participate in this process.

The Peak District National Park Authority is the Planning Authority for the National Park and has two Statutory Purposes and one Statutory Duty, as defined by the Environment Act (1995). These are: -

- i. To conserve and enhance the natural beauty, cultural heritage and wildlife of the National Park
- ii. To promote opportunities for understanding and enjoyment of the Park's special qualities

In carrying out these purposes, our Duty is to seek to foster the economic and social well-being of local communities within the National Park.

Our response to this consultation is largely based around our Purposes and Duty, but does cover the area outside the Park boundary and the wider area of influence of the proposed scheme.

Member of National Parks UK

Holder of Council of Europe Diploma



Chief Executive: Sarah Fowler

Chair: Lesley Roberts Deputy Chair: David Chapman


**Working together for the Peak District National Park:**

**• Where beauty, vitality and discovery meet at the heart of the nation •**

*Any information given to the Authority may be disclosed under the Freedom of Information Act 2000*

Our response to the scoping exercise is attached as an Annex to this letter, if you have any queries about any of content of our response then please contact me.

Yours sincerely



Tim Nicholson  
Transport Policy Planner



# **Annex 1 – Trans-Pennine Upgrade Programme Environmental Impact Assessment Scoping Report**

## **Response on behalf of the Peak District National Park Authority**

### **Background**

The Peak District National Park Authority is grateful for the opportunity to comment on the scope of the Trans-Pennine Upgrade Programme Environmental Impact Assessment. The Peak District National Park was the first of the British national Parks to be designated in 1951 and is located to the East of the villages of Mottram and Hollingworth, with the village of Tintwistle falling partially within the National Park boundary.

National Park Authorities are subject to two statutory purposes as set out within the National Parks and Access to the Countryside Act (1949) and reiterated within Section 61 of the Environment Act (1995). These purposes are: -

- i) The conserving and enhancing of the natural beauty, wildlife and cultural heritage of the National Park
- ii) The promotion of opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Section 62 of the Environment Act (1995) goes on to set out a statutory Duty for National Park Authorities, which is that in carrying out its statutory duties, it will seek to foster the economic and social well-being of local communities within the National Park. This section also places a duty on bodies undertaking work that affects land within a National Park to have regard to the two purposes given above.

This document constitutes a response on behalf of Officers of the Peak District National Park Authority offering comment and suggestion on the scope of the assessment. The response covers general points, detailed comments on individual elements being considered within the scope of the Assessment, and finally comments in relation to cumulative effects.

### **General Comments**

The current proposed scheme lies beyond the Peak District National Park boundary, following the current removal of the A628 Climbing Lane proposals. However, whilst the proposed Mottram Moor and A57(T) to A57 Link Roads are located beyond the National Park boundary, the traffic modelling indicates a significant growth in traffic flows on roads within the National Park, including the A628(T), the A57 Snake Pass and the A6024 Holme Moss Road. Because of the location of these roads and the suggested shift of traffic from other routes onto these roads, there are also potential traffic growth implications for minor roads within the National Park that facilitate these shifts in flow.

A growth in traffic on these National Park roads may bring a number of implications for the designated sites of the National Park (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area), the quiet enjoyment of the National Park by its visitors, and the safety of all users of these roads. Similarly, the predicted growth in traffic is likely to have a negative effect on the Tintwistle Conservation Area and its setting.

It is worth noting that some of the roads which are expected to see an increase in traffic as a result of the scheme were recently highlighted by the EuroRAP assessment as being amongst the riskiest in the country, including the A57 (Snake Pass) and the A6204 (Holme Moss)<sup>1</sup>. It is not unreasonable to suppose that a heavy increase in traffic of the levels predicted may worsen this situation.

---

<sup>1</sup> <http://roadsafetyfoundation.org/cutting-cost-dangerous-roads/>

Because of the potential impact on the National Park of induced traffic flows, we would suggest that the Study Area for potential impacts of the scheme in relation to Air Quality, Noise & Vibration, Biodiversity, and People & Communities should include any roads within the National Park where there is an increase in traffic flow of more than 5% as a result of the scheme in the opening year. This would allow the full impact of the proposed scheme on the national Park to be fully understood, and any potential opportunities for mitigation and enhancement to be identified.

The Project Objectives include an environmental objective of “*avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities*”. Because there is an expectation of a significant increase in traffic flows on roads within the National Park, through Tintwistle Conservation Area and through the designated sites, the Environmental Statement should demonstrate the ways in which this objective will be achieved.

## **Detailed Topic Based Comments**

### **1) Air Quality**

#### 5.2.1 Study Area

The approach of setting the operational Study Area in relation to traffic flows is supported. Paragraph 3.29 of the DMRB Volume 11 Section 3 Part 1 HA207/07 refers to designated sites and the need to account for air quality impacts on those. Any significant increase in traffic flows along the A628 through the National Park is likely to affect air quality and potentially impact on the designated sites therein (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area). Because of this we would suggest that scoping out of these designated sites suggested on Page 32 may be inappropriate until a judgement has been made on the potential air quality impacts on the designated habitats.

IAN 174/13 (referred to in paragraph 5.2.3, page 21), suggests that sensitive receptors for designated sites and associated transects should be completed as set out in HA207/07. Because of the scoping out of the designated sites, this has not been undertaken. We would suggest that because of the potential air quality impacts on these designated sites, that this work be undertaken as part of the Environmental Statement.

The currently projected 8% increase in flows (fixed demand) along the A628 between Tintwistle and Flouch would meet the 1,000 increase in vehicle threshold for the study area to be extended along the length of the corridor. However, there are other routes which are expected to undergo high percentage increases as a result of induced flows from the two proposed link roads, but which are unlikely to breach the 1,000 vehicle threshold. Because of the designated sites that the roads fall within (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area), we would recommend including them within the Study area. These include the A57 Snake Pass and A6024 Holme Moss roads.

#### 5.2.2 Baseline Conditions

(4) The paragraph refers to exceedance of the AQS within High Peak and the potential for this to lead to an AQMA for the area. The area of concern is inside the village of Tintwistle on the A628 and within the National Park boundary. It is therefore important that the Environmental Statement recognises this potential air quality impact on both the sensitive receptors within the village and on the National Park, and that this is acknowledged within the Statement.

The Pegasus crossing referred to within this paragraph lies within the Peak District National Park and acts as a crossing point for the Pennine Bridleway National Trail. As such, any exceedance of the AQS objective will impact on users of this National Trail. Because the proposed scheme is likely to increase vehicle flows by a significant amount, and with no change to the proportion of HGV traffic along the route, this could amount to a serious worsening of conditions at this location. Therefore, the Environmental Statement needs to recognise this potential air quality impact on both the National Park

and the National Trail, neither of which are referenced within this scoping document in relation to air quality.

(5) There is reference to the additional monitoring at 82 locations undertaken by Highways England, and where there were recorded exceedances on particular routes, including the A57 and A628. There are a number of monitoring sites shown on Figure 5.2 that are along the M67 corridor. It would be useful to receive clarity within the Environmental Statement as to whether the scheme either causes or raises levels of exceedance at these locations in addition to those referenced.

### 5.2.3 Design Mitigation and Enhancement Measures

IAN 174/13 (referred to in paragraph 3), suggests that sensitive receptors for designated sites and associated transects should be completed as set out in HA207/07. Because of the scoping out of the designated sites, this has not been undertaken. We would suggest that because of the potential air quality impacts on these designated sites, that this work be undertaken as part of the Environmental Statement.

### 5.2.4 Residual Effects

(2) It is important that the potential residual effects of the scheme on air quality and on the AQMAs and the designated sites (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area) are included within the Environmental Statement.

### 5.2.5 Assessment Methodology

**Local Air Quality Assessment** – it is important that local air quality assessment encompasses all of the roads which may be affected by changes in air quality, including those that may not meet the current suggested 1,000 vehicle increase as a result of the scheme. Because of the importance of the designated sites, the potential impacts on these sites of increased airborne pollution should be included.

**Regional Assessment** – similarly, it is important that given the regional assessment is not limited to the north-west, but covers an area including all of the roads potentially experiencing high percentage or numerical growth in vehicles.

## **2) Cultural Heritage**

### 5.3.1 Study Area

The proposed study area needs to take into account the very diverse topography of the area, and the proximity of the National Park. It might be that significant or designated heritage assets lie out with the 1km search zone. We would like to see this extended so that consideration could be given to the setting of the key assets (especially Grade II\* and Grade I listed buildings, and scheduled monuments) that might lie outside the 1km zone (the results of the ZTV would be helpful here). Also, the text does NOT include the number of Grade II listed buildings in the 1km search area (although they are mapped). Because of the expected impact of increased traffic on the Tintwistle Conservation Area (a key designated heritage asset), we would wish to see the Study Area extended to include the whole of the Conservation Area.

For clarity, the 1km search area should be shown on Figure 5.4.

### 5.3.2 Baseline Conditions

Please see the earlier comment above in relation to the search area. It should be noted that there are more than 18 Grade II listed buildings in the 500m search area; however, the report only mentions the 18 in the Longendale conservation Area.

**Additional information required to inform the ES:** Item (8), the heritage walkover survey needs to locate features to a 10m accuracy or better, and include photographs of selected features.

### 5.3.3 Design, Mitigation and Enhancement Measures

Item (2) should include borehole surveys and archaeological excavation.

### 5.3.4 Residual Effects

Item (1) the negative impact upon the setting of Melandra Roman fort during operation may also be significant. Similarly, negative impacts to Conservation Areas may extend beyond Mottram-in-Longdendale, particularly in respect to the residual impacts from increased traffic flows through the Tintwistle Conservation Area, as a result of the scheme.

### 5.3.5 Assessment Methodology

We would expect this section to reference more up to date guidance documentation, e.g.

- Chartered Institute for Archaeologists 2017 'Standard and guidance for historic environment desk-based assessment'
- Historic Environment Good Practice Advice Note 2 Managing Significance in Decision-Taking in the Historic Environment (HE 2015).
- Historic Environment Good Practice Advice Note 3 The Setting of Heritage Assets (HE 2015).
- Conservation Principles: policies and guidance (HE 2008) [a revision is currently under consultation, but the 2008 is still valid until the revision is published]

Similarly Item (2) is incomplete and needs these additions:

- Inspection of aerial photographs held by the Historic England Archive (including the National Mapping Programme) and accessible LIDAR sources, including analysis and feature plotting
- Assessment of data from the Portable Antiquities Scheme
- A statement of significance of the historic landscape and heritage features within it
- Setting assessment of key heritage features in tandem with/to inform the Landscape Visual Impact Assessment

### 5.3.6 Assessment Assumptions and Limitations

Item (2) another valid approach is that the assessment of potential archaeological deposits can be evaluated using intrusive techniques.

Item (3) the Grade II\* Listed Buildings should NOT be scoped out; we do not currently have sufficient information on the historical significance of the landscape, their setting, the Conservation Areas and settings or potential impacts to scope these out. [in addition, in section 5.5.6 Item (2) states that no areas are to be scoped out which conflicts with the proposal to scope out the Grade II\*].

Item (4) The National Park Authority does not hold the Historic Landscape Character Assessment data for this area, however, we would suggest that scoping this out would be a decision for the Greater Manchester Archaeological Unit to decide. Whilst the historic landscape character is of more recent date, this does not automatically confer upon it a lesser significance; this needs to be established. There seems to be a misunderstanding within the scoping document that time depth equates to significance, this is not the case. The recent historic landscape character can be equally significant to that of an older date dependent upon context.

## **3) Biodiversity**

### 5.4.1 Study Area

The preliminary fixed demand traffic modelling indicates that there will be a significant increase in traffic flows along the A628 within the National Park, including the maintenance of the proportion of HGV traffic as a result of the scheme. Similarly, there are two roads that are expected to undergo a significant percentage increase in vehicles (the A57 Snake Pass and the A6024 Holme Moss Road). All three of these roads are within designated sites (Dark Peak SSSI, South Pennine Moors Special Area of

Conservation and the Peak District Moors Special Protection Area). Therefore because of the potential operational impacts of the increased traffic flows on these routes, we would wish to see the Study Area extended to cover these roads within the National Park, rather than limiting it to 2km.

#### 5.4.4 Residual Effects

The expected increase in traffic on those routes within the National Park is likely to lead to the following negative impacts: -

- Impact on the South Pennine Moors Special Area of Conservation and Dark Peak SSSI through the increased deposition of atmospheric pollutants (principally Nitrogen). The principal sensitive features to this deposition are likely to be Blanket Bog; Upland Heath; and Upland Flushes/Mires
- Impact on Peak District Moors Special Protection Area, Dark Peak SSSI, in particular breeding / ground nesting moorland birds; and Species of Principal Importance for Conservation under S41 of the Natural Environment & Rural Communities Act 2006 (in particular Mountain Hare) through increased visual and noise disturbance and road kill.

It is important that any such potential impact forms part of the Environmental Statement.

#### 5.4.6 Assessment Assumptions and Limitations

(4) In light of the potential impacts on the Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area, we would expect all three to be considered within the scope of the assessment. We would also wish to see the following included as receptors: -

- Blanket Bog,
- Upland Heath
- Upland flushes / mires
- Moorland birds, including SPA species (peregrine falcon, short eared owl, merlin, and golden plover). Other moorland species that should be considered are curlew, red grouse, waders, lapwing, dunlin, ring ouzel.
- Mountain Hare

(7) We would wish to see the Peak District Moors Special Protection Area retained within the scope of the Environmental Assessment due to the potential impact on breeding moorland birds and mountain hare through visual and aural disturbance and road kill.

### **4) Landscape and Townscape Effects**

#### 5.5.1 Study Area

Whilst the physical works for the scheme are located outside the Park boundary, the residual effects of induced flow particularly on the A628(T) may bring visual impact for users of the National park including from National Trails including the Pennine Way, Trans Pennine Trail and Pennine bridleway. Some assessment of these visual and landscape effects should be considered.

#### 5.5.2 Baseline Conditions

(1) The use of the Peak District Landscape Strategy would be welcomed, particularly as this would provide a baseline against which to judge any effects of the potential increase in traffic resulting from the scheme<sup>2</sup>.

Bullet point 7 appears incorrect in relation to Figure 5.8 in that Figure 8 shows three Landscape Character types within the Dark Peak Western Fringe, rather than the three Landscape Character Areas referred to at this bullet (LCA Dark Peak Western Fringe, LCA Dark Peak and the LCA Dark

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<sup>2</sup> <http://www.peakdistrict.gov.uk/looking-after/strategies-and-policies/landscape-strategy>

Peak Yorkshire Fringe). Consideration of these three Landscape Character Areas within the assessment would however, be welcomed.

It should be noted that the Pennine Bridleway, whilst shown on Figure 5.8 is not referenced within section 5.5.2.

There is a potential for both the completed scheme to have a visual impact on visitors to and the setting of the National Park. At present, this has not been considered within the scoping document, and therefore, it is therefore important that views from high ground within the National Park are used to assess this. An appropriate viewpoint(s) could be from the high ground on Tintwistle Low Moor.

Some consideration should be given to the setting of Tintwistle Conservation Area and buildings that contribute to that setting, and the significance of the Conservation Area.

A list of Grade II Listed buildings within the 1km boundary of the Study Area would be a useful element of the Environmental Statement.

#### 5.5.4 Residual Effects

Because of the potential visual effect of increased traffic flows on the enjoyment of the National Park by its users, we would welcome the inclusion of baseline viewpoints from sensitive locations such as the Pennine Way and Trans Pennine Trails.

The Environmental Statement will also need to take account of the effect of the expected increased traffic flows on the Tintwistle Conservation Area and its setting.

## **5) People and Communities**

*Underlined text (in red) denotes suggested new text.*

*Strikethrough text (in red) denotes the suggested deletion of text.*

#### 5.6.2 Baseline Conditions

From Figures 5.11 and 5.4 we note the 500m Study Area is insufficient to properly include the Mottram in Longendale and Hollingworth communities (and the Mottram Conservation Area) that will be directly affected by the proposals. The Upgrade Programme is being proposed as the current road traffic density has a very significant negative impact on everyday life for these communities and therefore we suggest the Study Area should be wider, with 1km being more appropriate. A wider area of scoping coverage will help to give due account for the range of People and Communities factors for those communities which will be most affected by the Scheme.

Induced flows from operation of the Scheme, with Highways England estimating an 8% increase for the A628 and 9% increase for the A57 (Fixed Demand), with the increased traffic flows producing further adverse effects for Tintwistle and Glossop and the special qualities of the Peak District National Park. We would wish to see additional consideration for these communities, in particular the Tintwistle Conservation Area, and the proximity of the Peak District National Park.

We suggest the baseline conditions listed as bullet points at 5.6.1 should be expanded to give a brief comment/consideration to what might be included in the scoping of each of the asset types listed.

Perhaps 5.6.2 should then follow up this list?

Community Facilities and Commercial Assets already considered and indicated on Figure 5.11 (Appendix B) include:

- Schools; Churches; Doctor's Surgeries; Health Centres; Other - Mottram Agricultural Showground.
- For consideration to be added to the above: Post Offices; Parks/Playgrounds; Bus services

#### **Private Assets (2)**



Should this section include community assets? For example, the Mottram Showground and Show (a non-profit making organisation) is a community asset. The Mottram Showground and Show will be seriously affected by the Scheme. Should there be a special mention about this and the community aspect? We understand Mottram Show has acquired a new larger show ground. Is this outside of the proposed Scheme? If not what is proposed to happen to the Showground and Show?

### Access and Recreation (3)

The following rights of way and bridleway are either severed by or pass in close proximity to the Scheme.

- The Pennine Bridleway National Trail, available to horse riders, cyclists and walkers, has two alternative sections of route in the vicinity – [a] passing between Broadbottom and Hollingworth and [b] passing between Gamesley and the west side of Hadfield.
- Section [a], as detailed above, of the Pennine Bridleway National Trail (incorporating the Etherow Goyt Valley Way and Tameside Trail) crosses the A57(T) to A57 Link Road approximately 700m to the south of the A57 Mottram Moor to meet Wooley lane on the east of Hadfield Hollingworth. This section of the National Trail, public-right-of-way is likely to be severed by the Scheme.
- Section [b], as detailed above, of the Pennine Bridleway National Trail (incorporating the Trans-Pennine Trail National Cycle Route 62) crosses the A57 at a point just inside the Red Line Boundary with the potential for the route to be severed. The crossing point corresponds with the junction of the A57 Link Road and existing A57 at Woolley Moor and special consideration will be given to the segregation of the Trail and its users from the road network.

In addition to the above, it should be noted that the Pennine Way and Trans Pennine Way are National Trails, which currently suffer from the severance effects of having crossings of the A628 and / or A57 Snake Pass. Any increase in traffic resulting from the scheme on these roads will worsen the situation, therefore, this needs to be accounted for in the production of the Environmental Statement.

Figure 5.7 needs to be revised to show both of the alternative sections of National Trail route and the Trans-Pennine Trail (National Cycle Route 62). Figure 5.7 has 'Public Right of Way (PROW)' in the Legend but the PROW's have not been delineated.

The scoping should provide additional consideration for the safety of horse riders and cyclists, particularly with regard to noise and surfacing, with appropriate mitigation during construction and sympathetic design for the segregation of the National Trail from the A57 link road.

We would hope the Scheme will showcase high quality landscape restoration and enhancement for the Pennine Bridleway National Trail with appropriate visual and noise screening and proposals for habitat enrichment.

It is also worth noting that currently, the A628 Pegasus Crossing at Tintwistle, which carries the Pennine Bridleway, is subject to an exceedance of the AQS with regard to Nitrous Oxides. Any increase in traffic through Tintwistle is likely to worsen this exceedance.

#### 5.6.3 Design Mitigation and Enhancement Measures

##### **Construction (1)**

- In order to minimise disruption to footways, public rights of way or bridleways by severance, temporary diversions ...

##### **Operation (2)**

- Several ~~footpaths~~ footways, public rights of way or bridleways would be permanently affected by the Scheme. Mitigation would ...

Would hope to see scoping of sustainable transport and connectivity – public transport, walking, cycling – and how the Scheme might provide growth opportunities for sustainable travel modes as part of Environmental impact mitigation.

## **6) Noise and Vibration**

### 5.7.1 Study Area

We would wish to ensure that the impacts on the village of Tintwistle are within the scope of the study, as those properties adjacent to the A628 through the village are likely to experience a daily increase in traffic of more than 1,000 vehicles with expected peak flows in the am & pm above a 24 hour average. It is likely that the ground-borne vibration associated with heavy goods vehicle climbing uphill and braking downhill will also increase.

Because of the predicted induced traffic flows on roads such as the A628 Woodhead, A57 Snake Pass and A6024 Holme Moss roads, and their association with relatively tranquil areas and the quiet enjoyment of the National Park, we would recommend ensuring that these are included within the Study Area. This is particularly pertinent because National Trails such as the Pennine Way and Transpennine Trails are likely to experience an increase in noise as a result of a predicted significant growth in traffic. The predicted increase in flows is also likely to have an impact on species within the designated sites along these routes (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area). This should also be within the scope of the Environmental Impact Assessment.

### 5.7.2 Baseline Conditions

#### **Additional information required to form the ES**

(2) Refers to the High Peak District Council; presumably this should be a reference to High Peak Borough Council.

The paragraph also refers to sensitive receptors that will inform the Environmental Statement. Because of the predicted increase in traffic flows, it would be useful to include sensitive receptors associated with the designated sites Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area. Similarly we would suggest that receptors associated with the Trans Pennine Trail, Pennine Bridleway and Pennine Way should be incorporated into the ES.

### 5.7.4 Residual Effects

#### **Operation**

The current traffic model indicates an increase in traffic flows along the A628 (Woodhead), A57 Snake Pass and A6024 Holme Moss roads. Therefore it would be useful to include an assessment of the noise impact that this has in relation to disturbance of users of the National Park, particularly on the National Trails. We would also wish to see a better understanding of the potential impact of additional disturbance on the designated sites (Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area) and their species.

## **7) Road Drainage and the Water Environment**

The preferred scheme includes a junction with the existing A57 at Wooley Bridge. The new link road will cross over the River Etherow adjacent to this junction. According to the plans, a roundabout would be located within Floodzones 2 and 3 of the River Etherow. The footprint of the roundabout could act to restrict floodwater flows and it is suggested considerable weight should be given to the location, design and mitigation measures for both Construction and Operation that would produce minimal adverse effect upon Floodzones 2 and 3. The option of a signal controlled junction instead of roundabout may provide less of an obstruction to floodwaters but the design would need to provide highly efficient traffic flows.

Arnfield Reservoir and the other reservoirs higher up the Longendale valley should be considered in the scoping of flooding risk, to account for the possibility of a reservoir being emptied for maintenance or emergency. It is suggested that United Utilities might be included in the discussions as well as the Environment Agency and the Lead Local Flood Authority as identified at 5.8.3 (3).

From Figure 5.14, the area of 'sinks and issues' is wider than the 500m study area. It is suggested the Study Area is expanded to at least 600m to allow for this.

## 8) Geology and soils

Because there are no potential impacts within the National Park, we have provided no comments on this section.

## 9) Materials

*Underlined text (in red) denotes suggested new text.*

*Strikethrough text (in red) denotes the suggested deletion of text.*

### 5.10.1 Study Area

(2) Prioritisation will be given to the use of Some material resources ~~will~~ that originate onsite and are re-used onsite, such as excavated soil and cut and cover excavations ~~(that is re-used onsite).~~

### 5.10.3 Design, Mitigation and Enhancement Features

#### **Materials (1)**

- Most material resources would be transported by road or rail, using the existing highway network. The proximity and special qualities of the Peak District National Park will be taken into account and road movements of material resources or waste will avoid the use of roads through the National Park wherever possible. The transport of materials onto site and waste off site would be reviewed by the appointed Contractor on an ongoing basis ...

### 5.10.6 Assessment Assumptions and Limitations

(3) ... the capacity of Derbyshire and Greater er Manchester waste management ...

## 10) Climate

### 5.11.1 Study Area

The approach of combining the Study Area with that of Greenhouse Gas emissions is a sensible one, but as stated within the air quality section, some recognition of percentage increases in flow across the network would be welcomed rather than restricting the Study Area to roads with an increase in vehicles of 1,000 or more. The reason for this is that there are likely to be a number of roads that cumulatively see increased flows of more than 1,000 vehicles, with associated greenhouse gas emissions. Whilst we recognise that a balance will need to be struck as to what the overall increase in flows associated with the scheme is; the geography of the roads along which induced traffic flows should also be recognised. For example the current modelling suggests marked percentage increases in flows on the A57 Snake Pass and A6024 Holme Moss Roads. Both of these roads are steep and twisting, crossing high summits in comparison to the routes from which the traffic is being in effect diverted. This is likely to result in the requirement for driving in lower gears, with marked acceleration and deceleration for tight corners. Both of these behaviours are likely to result in an increase in Greenhouse Gas and other emissions as a result. It is important that this is captured if the EIA is to truly reflect the wider impacts of the scheme.

Similarly with regard to climate change adaptation, it should be noted that a number of the roads potentially experiencing increased traffic flows as a result of the scheme are within Derbyshire (East Midlands) including the A628 east of Hollingworth and west of Salters Brook, the A57 east of the A57 (T) to A57 Link Road and the A6024 Holme Moss Road. The A57 Snake Pass is already subject to regular closures due to its underlying geology and the effects of heavy rain, drought and frost. Therefore, in assessing resilience to climate change and the effects of severe weather on the overall network which feeds or is fed from the scheme, these roads need to be taken under consideration.

This section states that 'The study area for climate change adaptation will comprise the north west region.' The scheme has the potential to bring about area wide traffic growth through induced flows from

operation of the Scheme, for example Highways England estimate traffic growth of 8% for the A628 and 9% growth for the A57. Highways England also indicates a general increase of traffic flows over a wide network of other roads.

This may in turn act to increase greenhouse gas emissions, including across the A628 and A57 Trans-Pennine routes through the sensitive environment of the Peak District National Park, and we would wish to see a further extent of the study area to take this into consideration. Delivery of the scheme may coincide with the greater availability and ownership of newer low emission vehicles. The scoping should include the investigation of road design and/or additional infrastructure that may help encourage the uptake of newer zero or low emission vehicles using the new road and connected routes.

## **Cumulative Effects**

Overall the scheme is expected to increase traffic flows on the following National Park roads; A628 Woodhead, A57 Snake Pass and A6024 Holme Moss. This increase in traffic, which is a direct result of the proposed scheme, is likely to impact on sections of the National Park across the various topic areas, and it is important that this cumulative impact is reflected within the Environmental Statement. The potentially areas affected include: -

### **Designated sites: Dark Peak SSSI, South Pennine Moors Special Area of Conservation and the Peak District Moors Special Protection Area**

These sites are likely to be to see an increase in noise and disturbance and a decrease in air quality leading to increased nitrogen deposition, affecting the habitats and species of these designated sites.

### **National Trails: Pennine Way, Trans Pennine Trail, Pennine Bridleway)**

These trails are likely to see an increase in noise and disturbance and a decrease in air quality where they cross or run close to roads with increased traffic flows. The increase in traffic will also lead to greater severance for users and a loss of visual amenity.

### **Tintwistle Village and Conservation Area**

Residents of Tintwistle are likely to experience a large increase in traffic flows resulting in a decrease in air quality, which may impact on the yet-to-be-declared High Peak Borough Council AQMA. There will also be an increase in traffic noise, with the corresponding increase in severance and loss of visual amenity. This is likely to negatively affect the setting of the Tintwistle Conservation Area.

Because the scheme is in and of itself expected to open up development land in and around the two proposed link roads, with the effects that this is likely to have on local traffic, it is important that this is factored in to any consideration of the predicted traffic impacts.

Similarly, as it is unlikely that this scheme will and of itself end the issues of congestion between the M67 Mottram junction and the eastern boundary of Tintwistle, some consideration should be given to any possible future remedial schemes, both local and strategic. There are two reasons for this: -

- 1) It is reasonable to assume that the currently proposed scheme should be complementary to any future proposals;
- 2) In undertaking a piecemeal approach to resolving the issues within the area, it is possible to overlook the both the cumulative benefits and impacts of any schemes. Because these affect the national asset which is the Peak District National Park, it is important that they are identified sooner rather than later.

### **Table 6-1: The Established ZOIs for Environmental Topics**

The Cultural Heritage should not necessarily be limited to 1km – it depends on the significance of assets. Because of the topography, visual impact in particular could extend to assets that are more distant, although this is only likely to be a constraint for the most significant assets. Likewise, ‘setting’ is not considered to have a defined limit, so some flexibility must be given to the 1km area. The ZTV study may help to define this zone spatially.

### **Table 7-3: Environmental Topics Scoped Out with Justification**

We currently have insufficient detail to understand the full impact on the Grade II\* buildings or their setting so feel that they should not be scoped out.

The historic landscape character should not be scoped out purely on the basis that the character of the area has a high proportion of modern character types. This does not necessarily equate to a lack of significance.

Because of the potential impact of increased traffic flows on the species associated with it, we would suggest that the Peak District Moors (South Pennine Moors Phase 1) SPA should not be scoped out of the ES at this stage.

## **Appendices**

### **Appendix A: Significance Criteria**

11.1.12. The reference to Conservation Principles: Policies and Guidance is actually still 2008 (but note a revision is due soon, possibly in 2018).

**Table 11-2, 11-3 and 11-4** do not take into account the assessment of 'value' as outlined in Conservation Principles: Policies and Guidance. This assessment must also take into account the evidential, historical, aesthetic, communal values (notwithstanding the possible changes to these concepts as a result of the forthcoming guidance revision).

### **Table 11-5**

There needs to be an '**unknown**' row, for potential impacts on buried deposits for which we currently have no information.

### **Table 11-5 and 11-6**

Alter the second sentence of each row, to relate the setting to the significance of the asset

Major: **Comprehensive changes to setting that affect the significance of the asset.**

Moderate: **Considerable changes to setting that affect the significance of the asset.**

Minor: **Minor changes to setting that affect the significance of the asset.**

Negligible: **Very slight changes to setting that affect the significance of the asset.**

### **Table 11-8:**

There needs to be an '*unknown*' impact to allow for unknown buried archaeological deposits.



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Your Ref: TR050005  
Our Ref: CIRIS 40503

5<sup>th</sup> December 2017

Dear Dr Hunt

**Planning Act 2008 (as amended) and The Infrastructure Planning  
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) –  
Regulations 10 and 11**

**Trans-Pennine Upgrade Programme: Mottram Moor Link Road Scheme  
including A57(T) to A57 Link Road Scheme**

Thank you for your letter of 9<sup>th</sup> November 2017, inviting Public Health England (PHE) to provide comments on the scoping opinion for the Environmental Statement (ES) relating to the above Nationally Significant Infrastructure Project (NSIP).

The comments below are provided on the basis that this stage is a precursor to an intensive and detailed assessment of the potential health impacts of the proposed development.

Our response focuses on health protection issues relating to chemicals, poisons and radiation. The advice offered is impartial and independent. In order to ensure that public health is comprehensively considered the ES should provide sufficient information to allow the potential impacts of the development on public health to be fully assessed.

We have reviewed the 'Trans-Pennine Upgrade Programme: Environmental Impact Assessment Scoping Report' document (dated November 2017) and accept the general approach proposed for assessing potential impacts on human health.

In order to assist the production of an ES, we have included an appendix which outlines the generic considerations that we advise should be addressed by all promoters when they are preparing an ES for an NSIP.

We note that a separate section summarising the public health impacts of the proposed development on public health is not proposed but is to be included within the Peoples and Communities chapter; we ask that this section be included, in line with the recommendations in the appendix that follows.

We note that assessment of PM<sub>10</sub> and NO<sub>2</sub> will be carried out, but fine particulate matter (PM<sub>2.5</sub>) within the air quality section is not proposed and further justification for this is not provided. PM<sub>2.5</sub> is of particular interest with regard to transport emissions and the impact of air quality upon public health. We would therefore request that this be considered in the air quality assessment.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Our view is that the assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal. Where a promoter determines that it is not necessary to undertake detailed assessment(s) (e.g. undertakes qualitative rather than quantitative assessments), if the rationale for this is fully explained and justified within the application documents, we consider this to be an acceptable approach.

We will provide further comments when the ES becomes available.

Yours sincerely

Sian Morrow  
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*Please mark any correspondence for the attention of National Infrastructure Planning Administration.*

## Appendix: PHE recommendations regarding the scoping document

### General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA<sup>1</sup>. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the proposal. Assessment should consider the development, operational, and decommissioning phases.

The EIA Directive<sup>2</sup> requires that ESs include a description of the aspects of the environment likely to be significantly affected by the development, including "population". The EIA should provide sufficient information for PHE to fully assess the potential impact of the development on public health. **PHE will only consider information contained or referenced in a separate section of the ES summarising the impact of the proposed development on public health:** summarising risk assessments, proposed mitigation measures, and residual impacts. This section should summarise key information and conclusions relating to human health impacts contained in other sections of the application (e.g. in the separate sections dealing with: air quality, emissions to water, waste, contaminated land etc.) without undue duplication. Compliance with the requirements of National Policy Statements and relevant guidance and standards should be highlighted.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES<sup>3</sup>.

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

### Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial and

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<sup>1</sup> Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/documents/planningandbuilding/pdf/151087>

<sup>2</sup> Directive 85/337/EEC (as amended) on the assessment of the effects of certain public and private projects on the environment. Available from: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1985L0337:20090625:EN:PDF>

<sup>3</sup> DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>



industrial premises; and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land; surface and groundwater; and drinking water supplies, such as wells, boreholes and water abstraction points.

### **Impacts arising from construction and decommissioning**

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on public health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should also ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

### **Emissions to air and water**

Significant impacts are unlikely to arise from sites which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the development in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases, as appropriate
- should consider the typical operational emissions, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts

- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
  - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
  - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the development, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed development on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

### *Additional points specific to emissions to air*

When considering a baseline (of existing air quality) and in the assessment and when considering future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

### *Additional points specific to emissions to water*

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water

## **Land quality**

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed<sup>4</sup> and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

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<sup>4</sup> Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

## **Waste**

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the development the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

## **Other aspects**

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report<sup>5</sup>, jointly published by Liverpool John Moores University and PHE, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible.” PHE supports the inclusion of this information within EIAs as good practice.

## **Electric and magnetic fields (EMF)**

This statement is intended to support planning proposals involving electrical installations such as substations, underground cables and overhead lines. PHE

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<sup>5</sup> Available from: <http://www.cph.org.uk/publication/health-risk-perception-and-environmental-problems/>

advice on the health effects of power frequency electric and magnetic fields is available in the following link:

<https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

There is a potential health impact associated with exposure to the electric and magnetic fields produced around substations, power lines and cables. The following information provides a framework for considering the health impact, including the direct and indirect effects of exposure.

#### Policy Measures for the Electricity Industry

In 2004, the Government adopted the exposure guidelines published in 1998 by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) within the framework of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC). In 2009, one additional precautionary policy was introduced relating to the optimum phasing of high-voltage power lines. The National Policy Statement for Electricity Network Infrastructure EN-5 confirms these policies, and the Department of Energy and Climate Change (DECC) has published two accompanying Codes of Practice, agreed between the Energy Network Association and the Government, which specify how the guideline compliance and the optimum phasing requirements are implemented:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf)

A companion code of practice dealing with indirect effects of exposure to power frequency electric fields is also available:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/224766/powerlines\\_vcop\\_microshocks.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf)

#### Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, the Government policy is that the ICNIRP

guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

[http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/HealthProtection/DH\\_4089500](http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/HealthProtection/DH_4089500)

### Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

### Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m<sup>-1</sup> (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

### Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

### The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for implementing precautionary measures for extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

<http://www.emfs.info/policy/sage/>

SAGE published its First Interim Assessment in 2007, recommending various low cost measures aimed at reducing exposure. One of the recommendations was the introduction of optimal phasing of dual circuit high voltage power lines, which the Government supported in its response published in 2009. Government was also asked to consider the option to create corridors adjacent to high voltage power lines on health grounds; however, this was not supported as it was regarded to be disproportionate given the evidence base on the potential health risks arising from exposure. The full Government response to SAGE's First Interim Assessment is available here:

[http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_107124](http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124)

SAGE also called for more information to be made available to the public on the possible health consequences of power frequency electric and magnetic fields, and the Health Protection Agency developed new web material, which is available here:

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Topics/Radiation/UnderstandingRadiation/UnderstandingRadiationTopics/ElectromagneticFields/ElectricAndMagneticFields/>

**Liaison with other stakeholders, comments should be sought from:**

- the local authority for matters relating to noise, odour, vermin and dust nuisance;
- the local authority regarding any site investigation and subsequent construction (and remediation) proposals to ensure that the site could not be determined as 'contaminated land' under Part 2A of the Environmental Protection Act 1990;
- the local authority regarding any impacts on existing or proposed Air Quality Management Areas;
- the Food Standards Agency for matters relating to the impact on human health of pollutants deposited on land used for growing food/ crops;
- the Environment Agency for matters relating to flood risk and releases with the potential to impact on surface and groundwaters;
- the Environment Agency for matters relating to waste characterisation and acceptance; and,
- The relevant local authority Directors of Public Health for Tameside, and Sheffield for matters relating to wider public health.

## **Environmental Permitting**

Amongst other permits and consents, the development may require an environmental permit from the Environment Agency to operate (under the Environmental Permitting (England and Wales) Regulations 2010). If so, any permitted activity will need to comply with the requirements of best available techniques (BAT). PHE is a consultee for bespoke environmental permit applications and will respond separately to any such consultation.



## Annex 1

### Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach<sup>6</sup> is used

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<sup>6</sup> Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24



## Trans Pennine Upgrade Programme

### Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

#### Introduction

Reference the letter from PINS to Royal Mail dated 9 November 2017 requesting Royal Mail's comments on the information that should be provided in Highways England's Environmental Statement for the proposed Trans Pennine Upgrade Programme.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report as submitted to PINS on 8 November 2017.

#### Royal Mail– relevant information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

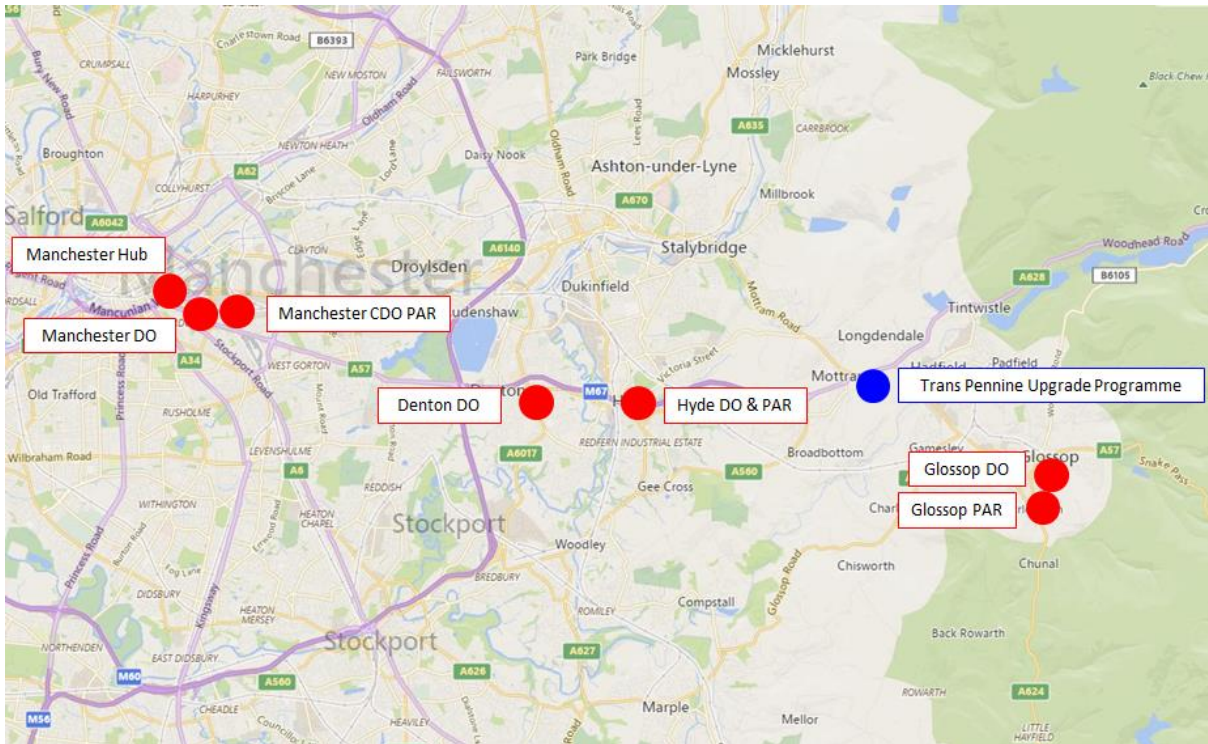
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction and operation of this proposed road scheme.

Royal Mail's has eight operational properties within 10.2 miles of this proposed new road scheme as listed and shown on plan below:

BE 2566	Glossop DO	4 Victoria Street, Glossop SK13 8AA	2.9 miles
BE 4200	Glossop PAR	Victoria Street, Glossop SK13 8HZ	2.9 miles
BE 2576	Hyde DO	Hamnett Street, Hyde SK14 1AA	3.3 miles
BE 3767	Hyde PAR	John Street, Hyde SK14 2HQ	3.3 miles
BE 2546	Denton DO	Saxon Street, Manchester M34 6AA	4.9 miles
BE 4292	Manchester CDO PAR	Devonshire Street North, Manchester M12 6JH	9.5 miles
BE 3659	Manchester Central DO	40 Higher Ardwick, Manchester M12 6DA	9.5 miles
BE 357	Manchester HUB	Unit 5-6 Downing Street Industrial Estate, Manchester M12 6HH	10.2 miles



The M67 and the A57 are both important strategic distribution routes for Royal Mail operational traffic. Also, in exercising its statutory duties Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by additional traffic arising from the construction of the proposed new dual carriageways and associated infrastructure.

It is envisaged that the proposed Trans Pennine Upgrade Programme will, once constructed, improve road capacity which will have benefits for Royal Mail operational traffic movements. However, Royal Mail is concerned about the potential for disruption to its operations during the construction phase.

### **Royal Mail's comments on information that should be provided in Highways England's Environmental Statement**

In view of the above, Royal Mail has the following comments / requests:

1. The ES should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted through full advance consultation by the applicant at the appropriate time in the DCO and development process.
2. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Highways England / its contractor, including a draft Construction Traffic Management Plan (CTMP).
3. Royal Mail is fully pre-consulted by Highways England / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant major road users.



Royal Mail is able to supply Highways England with information on its road usage / trips if required.

Should PINS or Highways England have any queries in relation to the above then in the first instance please contact Holly Trotman (***holly.trotman@royalmail.com***) of Royal Mail's Legal Services Team or Daniel Parry-Jones (***daniel.parry-jones@bnpparibas.com***) of BNP Paribas Real Estate.

**From:** [Customer](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** Automatic reply: TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation  
**Date:** 09 November 2017 12:02:02

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1. All your contact details (name, company name, address and phone number)
2. The full address and postcode of the site
3. Any reference numbers you may have

If you have any more information you'd like to provide, please send it on to [customer@sgn.co.uk](mailto:customer@sgn.co.uk).

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**STOCKPORT**  
METROPOLITAN BOROUGH COUNCIL

**Planning Services**  
Place Directorate, Stopford House,  
Piccadilly, Stockport SK1 3XE

Mr Richard Hunt  
3D Eagle Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Contact: Mark Jordan  
Telephone: 0161 474 3557  
Email: Mark.Jordan@Stockport.gov.uk  
Website: [www.stockport.gov.uk/planning](http://www.stockport.gov.uk/planning)

Date: 20th November 2017

Dear Mr Richard Hunt,

**Reference:** DC/067709

**Proposal:** Scoping consultation - Trans Pennine Upgrade Programme.

**Location:** Mottram Moor To A New Junction On The A57 At Brookfield

I acknowledge receipt of your application received in my office on 9th November 2017 relating to the above proposed development. I also acknowledge receipt of £ .00 as payment for determination of the application. Your application has been checked to make sure everything is in order and if for any reason it is later found to be invalid, you will be informed as soon as possible.

Every effort will be made to ensure a speedy decision although many applications do require considerable consultation with other interested parties and adjoining property owners. This can at times prove time-consuming.

If you have not received a decision by 4th January 2018 I will let you know why and ask you for more time to deal with it. Should you not agree to an extension of time you are able to Appeal to the Planning Inspector against non-determination of the application. Alternately the Authority will determine the application based on the information to hand.

If you do not agree with how the application is described, or you have any queries concerning your application, it is important that you contact Mark Jordan, the Case Officer who will be dealing with your application, as soon as possible.

Please be aware that your proposal may require consent under the provision of the Building Regulations and you are advised to contact Building Control Officers at the above address (Telephone 0161 474 3559)

Progress details of the application including consultation and publicity undertaken and relevant policy constraints can be found on the web site at:

[www.stockport.gov.uk/planningdatabase](http://www.stockport.gov.uk/planningdatabase)

Please note:

If you have an "Anonymous Call Rejection" service on your telephone, which stops callers who withhold their phone number contacting you, you will be unable to receive any calls made from the Town Hall switchboard, including any return calls.

Please mention this when leaving messages in order that alternative arrangements can be made or, alternatively leave a mobile number.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Emma Curle', written in a cursive style.

Emma Curle - BSc (Hons) MRTPI  
Chief Planning Officer

**FAO: Dr Richard Hunt**  
**3D Eagle Wing**  
**Temple Quay House**  
**2 The Square**  
**Bristol**  
**BS1 6PN**

**Robin Monk**  
**Executive Director**

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Ask for  
Direct Line 0161 342 3920  
Twitter @tmbc\_places

email: [nigel.gilmore@tameside.gov.uk](mailto:nigel.gilmore@tameside.gov.uk)

Your Ref: TR010034-000004  
Our Ref  
Doc Ref  
Date: 6<sup>th</sup> December 2017

Dear Sir

### **Trans-Pennine Upgrade Programme Environmental Impact Assessment Scoping Report**

Thank for your letter in respect of the above scoping report dated 9th November 2017 received on 13th November 2017 asking for additional information and comment on its contents.

Overall the scoping report appears to be comprehensive and establishes a positive narrative for the future scope of the Environmental Statement required for the Trans-Pennine Upgrade Programme for:

- Mottram Moor Link Road Scheme
- A57(T) to A57 Link Road Scheme.

The full history of the initiative, as set out in the text at the beginning of the report, is well documented within Tameside. It also notes the development of the current scheme initiative cumulating in the non-statutory public consultation held between 13 March 2017 and 10 April 2017.

The following represents Tameside's comments and suggested amendments in respect of the documentation.

1. **Sections 5.3, Cultural Heritage:** There are no comments to make on the scope of this section, which is considered to be comprehensive. It is noted that the Residual Effects at 5.3.4 identify that impacts on the setting of Mottram in Longdendale Conservation Area and some of the Grade II listed buildings are predicted to be significant during construction and operation. Consequently, consideration will need to be given to how these impacts may be mitigated once they have been assessed.
2. **Section 5.6, People and Communities:** Paragraph 5.6.2(4) dealing with "Development Land" states that there is no development land allocated in the vicinity of the scheme. This is correct in terms of adopted allocations but reference should be made to draft allocations adjoining the western end of the proposed bypass in the consultation draft Greater Manchester Spatial Framework (GMSF). It is acknowledged that the GMSF is at a very early stage but the scoping document should as a minimum recognise these draft allocations. The draft allocations can be



viewed at: [https://mappinggm.org.uk/gmsf-consultation-2016/#os\\_maps\\_light/10/53.5069/-2.3201](https://mappinggm.org.uk/gmsf-consultation-2016/#os_maps_light/10/53.5069/-2.3201)

3. **Section 6.3, Assessment of Cumulative Effects:** A reference to draft GMSF allocations should also be made in section 6.3, Assessment of Cumulative Effects. Furthermore although the process of creating a short list of “other development” is explained in sections 6.3.4-6.3.7, the threshold criteria is not made clear, nor are there any identification of what other developments were included on the “long list”. The resulting table of cumulative developments does not fully reflect the matrix approach recommended at Appendix 1 of the Planning Inspectorate’s Advice Note 17: Cumulative Effects Assessment. This section of the scoping report should be visited to provide a more transparent application of the approach to shortlisting.

Finally, this section does not appear to have considered development proposals in the Hattersley Area which sits within the Zones of Influence at the western end of the proposed bypass. These sites may be identified within the Council’s Land Supply Update 2016. The sites may be found at <https://www.tameside.gov.uk/planning/ldf/evidence/shlaa> where there is a searchable spread sheet with listed sites

4. **Section 5.4, Biodiversity:** There is general agreement with the overall scope of the Ecological Receptors identified in Section 5.4 of the Scoping Report. At this stage it is not considered that additional Receptors need to be “scoped in”. Furthermore Tameside would not disagree with the scope of the ecological surveys described and consider that additional surveys required to inform the proposals are not necessary.
5. **Other comments:** It is recommended:
  - That the Environmental Impact Assessment (EIA) fully considers the need for the development to achieve net gain for biodiversity where possible, in line with paragraph 109 of the National Planning Policy Framework.
  - That the EIA fully considers the need to avoid landscape and habitat fragmentation wherever possible and the need to retain and where achievable, enhance landscape connectivity.
  - That any lighting schemes designed for the scheme minimise light spill and take into account the needs of nocturnal wildlife.
6. It is also noted that further consultation with Natural England is required to determine the need for the application for development consent to be supported by a Habitats Regulations Assessment (HRA) because of potential harmful impacts on sensitive habitats within the Peak District Moors (South Pennine Moors Phase 1), Special Protection Area (SPA) and South Pennine Moors Special Area of Conservation (SAC). It is recommend that the Screening exercise for the HRA fully takes into account the scope of new development proposed for the area as part of the developing Tameside Local Plan process and the draft Greater Manchester Spatial Framework (GMSF) as noted above. These Plans may have a bearing on the cumulative impact of the road scheme (potentially increasing in combination effects).
7. Tameside does not necessarily concur with the all the areas of scoped out work contained in the document.

Table 7.2 notes that for Road Drainage and the Water Environment “the residual effects for the operational phase are not expected to be significant.” Is this considered to be the correct approach in this instance?

With reference to section 2 above and Table 7.3, Development and Employment Land forming part of the People and Communities the scoping out of the potential strategic employment sites does not take cognisance of those contained within the draft Greater Manchester Spatial Framework and elsewhere.

The Environmental Impact Assessment Scoping Report is the first stage in developing an Environmental Statement for the two initiatives listed above. The additional information and comment made in this response should further enhance this report. Tameside looks forward to receiving the future Environmental Statement as the scheme develops into the next stage.

Yours faithfully,

A handwritten signature in black ink that reads "Nigel Gilmore". The signature is written in a cursive, slightly slanted style.

**Nigel Gilmore**  
**Head of Strategic Infrastructure**  
**Development and Investment**

**From:** [assetrecords@utilityassets.co.uk](mailto:assetrecords@utilityassets.co.uk)  
**To:** [prvs=04825E1941=Trans-PennineUpgradeProgramme@pins.gsi.gov.uk](mailto:prvs=04825E1941=Trans-PennineUpgradeProgramme@pins.gsi.gov.uk)  
**Subject:** Re: TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation  
**Date:** 09 November 2017 12:12:26

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Thank you for recently contacting Utility Assets plant record department. We will check whether we have any plant present at your site and contact you within 5 - 7 working days ONLY if we own any plant in the vicinity.

If we do not reply, we do not have any apparatus in the area of your works. However, PLEASE TAKE CARE when excavating around electricity cables in the event that not all cables present may be accurately shown. We recommend you use detecting equipment to map the site before excavating and fully comply with HSG47. DO NOT assume that a cable is dead if you don't have a record of its presence. The cable must be treated as live unless PROVEN DEAD by the cable owner. In case of emergency please contact your local electricity distribution company.

This is an automated reply from our dedicated asset records email address. If you receive further correspondence from us it will be from [asset.manager@utilityassets.co.uk](mailto:asset.manager@utilityassets.co.uk) quoting a site reference number.

Asset Manager - Utility Assets Ltd

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**From:** [Danielle Thomas](#) on behalf of [Dig](#)  
**To:** [Trans-Pennine Upgrade Programme](#)  
**Subject:** RE: TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation  
**Date:** 15 November 2017 12:15:06  
**Attachments:** [image001.png](#)

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Good afternoon

With regards to your below request, this is not Wales & West Utilities area. This falls within Cadent's area, contact details for them below:

Email: [plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

Telephone: 0800 688588

If you have any further questions please don't hesitate to contact me. Many thanks

Kind Regards,

**Danielle Thomas**  
Plant Protection Team  
Administrator Assistant

Telephone: **02920 278 912**

Email: [Danielle.Thomas@wwutilities.co.uk](mailto:Danielle.Thomas@wwutilities.co.uk)

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Celtic Springs | Newport | NP10 8FZ



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**From:** Trans-Pennine Upgrade Programme [<mailto:Trans-PennineUpgradeProgramme@pins.gsi.gov.uk>]  
**Sent:** 09 November 2017 12:02  
**Subject:** TR010034 - Trans Pennine Upgrade Scheme - EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Trans Pennine Upgrade Programme.

Please note the deadline for consultation responses is **7 December 2017**, and is a statutory requirement that cannot be extended.

Kind regards,