

A57 Link Roads TR010034 9.5 Comments on Relevant Representations

Rule 8(1)(c)(i)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

December 2021



Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

9.5 Comments on Relevant Representations

Rule Number:	Rule 8(1)(c)(i)
Planning Inspectorate Scheme	TR010034
Reference	
Application Document Reference	TR010034/EXAM/9.5
Author:	A57 Link Roads Project Team, National Highways

Version	Date	Status of Version
Rev 1.0	December 2021	Deadline 1



Table of contents

Chapter		Pages
1. Intro	duction	5
Part 1 – Lo	ocal Authorities	7
RR-0240 &	R-0330 Derbyshire County Council and High Peak Borough Council	8
RR-0677	Peak District National Park Authority	17
RR-0861	Tameside Metropolitan Borough Council	26
Part 2 – Pa	arish Councils	28
RR-0244	Derwent and Hope Woodlands Parish Council	29
RR-0809	Bamford with Thornhill Parish Council	30
Part 3 - St	atutory Consultees	31
RR-0621	Natural England	32
RR-0814	Sport England	35
Part 4 – Ut	ilities	36
RR-0110	Cadent Gas Limited	37
RR-0691	National Grid Electricity Transmission plc.	39
Part 5 - La	ndowners	40
RR-0173	CS, JJ & WE Bower on behalf of CS, JJ & WE Bower	41
RR-0174	CS, JJ & WE Bower on behalf of C Bower & Sons Ltd	42
RR-0434	John J. Bower	43
RR-0308	Graham Beaumont	44
RR-0323	Hayley Simpson	45
RR-0383	Jason Farrow	46
RR-0604	Michaela Bromley	47
RR-0794	Savills on behalf of Trustees of Mrs E Bissill's Marriage Settlement	48
RR-0792	Savills (UK) Ltd on behalf of Crossways Commercial Estates Ltd	53
RR-0793	Savills (UK) Ltd on behalf of Mr D Radford	54
Part 6 - Ot	ther interest & amenity group	55
RR-0106	British Mountaineering Council	56
RR-0113	Campaign for National Parks	60
RR-0161	Climate Emergency Planning and Policy	64
RR-0169	CPRE Lancashire, Liverpool City and Greater Manchester	66
RR-0170	CPRE Peak District and South Yorkshire	72
RR-0239	Derbyshire Climate Coalition	81
RR-0281	Friends of the Earth England, Wales and Northern Ireland	83



Part 8 - Re	presentations in support of the Scheme	163
Other Indivi	dual Issues	139
RR-0182	Daniel Wimberley	133
RR-0080	Anthony Rae	131
Part 7 – Ind	lividuals	130
RR-0880	Transport Action Network	127
RR-0879	Trans Pennine Trail	125
RR-0877	Udo Pope on behalf of Peak and Northern Footpaths Society	121
RR-0801	Sheffield Green Party	119
RR-0800	Sheffield Climate Alliance	117
RR-0796	Sharefirst My Journey to School	110
RR-0751	Robert Hodgetts Haley on behalf of High Peak Green Party	107
RR-0640	Norwich and Norfolk Friends of the Earth	106
RR-0620	National Trust	104
RR-0485	Keith Buchan	102
RR-0336	Holme Valley Vision Network	100
RR-0331	High Peak Green New Deal	98
RR-0303	Glossopdale Branch Labour Party	93
RR-0282	Friends of the Trans Pennine Trail	87



1. Introduction

- 1..1. The Development Consent Order (DCO) application for the A57 Link Roads was submitted on 28 June 2021 and accepted for examination on 26 July 2021.
- 1..2. The purpose of this document is to set out National Highways' response to the key issues raised by the Relevant Representations (RR). A total of 909 RRs were submitted to the Planning Inspectorate by Interested Parties. National Highways has reviewed and considered all of the RRs and provided comments where it is helpful to the Examination to do so, for instance where a relevant representation includes a request for further information or clarification from National Highways or where it is considered that it would be appropriate for the Examining Authority to have National Highways' view in response to a matter raised by an Interested Party in its representations.
- 1..3. National Highways has not directly responded to every RR. Where all of a Representation's issues have been dealt with in another RR, its reference number has been listed in the fourth column of the response table, under the heading 'Also Applies to'.
- 1..4. Where certain issues raised within a representation have been dealt with previously by National Highways, for instance in response to a question posed by another party or within one of the application documents submitted to the Examination, a cross reference to that response or document is provided to avoid unnecessary duplication. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1..5. National Highways has not responded directly to every point made within the Relevant Representations. In some cases no comments have been provided, for instance, because the Relevant Representation was very short. For the avoidance of doubt, where National Highways has chosen not to comment on matters raised by Interested Parties this is not an indication National Highways agrees with the point or comment raised or opinion expressed.
- 1..6. For the purpose of this document National Highways has categorised Interested Parties into one of eight groups, with each group assigned a section as set out below:
 - Part 1 Local Authorities (three Interested Parties, including the Peak District National Park Authority);
 - Part 2 Parish Councils (two Interested Parties);
 - Part 3 Statutory Consultees (two Interested Parties);
 - Part 4 Utilities (two Interested Parties);
 - Part 5 Landowners (ten Interested Parties);
 - Part 6 Other Interest & Amenity Groups (twenty two Interested Parties);
 - Part 7 Individual members of the public including unique issues which could not be cross referenced elsewhere in the document.



Part 8 contains National Highways' response to RR's made in support of the Scheme (680 Interested Parties) and where National Highways felt that no further clarification was needed. The content of the 680 RRs in this category has not been copied into this document. Instead, National Highways has provided the reference number assigned to each RR in the Relevant Representations Library 7 October 2021 available here:
 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010034/TR010034-000602-A57%20Link%20Roads%20Relevant%20Representations%20Library.pdf

Part 1 – Local Authorities



RR-0240 & R-0330 Derbyshire County Council and High Peak Borough Council

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-1	"A57 Link Roads Scheme Development Consent Order S56 Representation from Derbyshire County Council and High Peak Borough Council This representation has been jointly prepared by Derbyshire County Council (DCC) and High Peak Borough Council (HPBC). For context, both authorities have engaged with Highways England throughout the Development Consent Order process, including attendance at the stakeholder meetings organised by Highways England. Nevertheless, the two Councils submitted holding objections in response to the public consultations held by Highways England in both 2018 and 2020.		RR-0448, RR-0526 RR-0244, RR-0540 RR-0543, RR-0604 RR-0605, RR-0713 RR-0720
RR-0240-2	Fundamentally, the objections were due to the lack of supporting information regarding the traffic and related implications of the scheme. In relation to the DCO application as submitted to the Planning Inspectorate, unfortunately, our current position is that our holding objection should be maintained. In spite of our previous request for further information, the Environmental Statement and supporting documents do not address our concerns. Having reviewed the submission, the two Councils have identified a number of gaps in the transport assessment data and subsequent queries and requests for information have been made to Highways England. In the context of the above, a summary is provided below of the Member and Officer comments of both authorities on the scheme.	National Highways engagement with DCC and HPBC is ongoing and we have sought to provide additional information as and when requested. This has included the following: A detailed design kick off meeting was held with DCC on the 21 July 2021 and; Traffic data showing the details of capacity at six junctions in the High Peak area, on the A57 from Woolley Bridge through to Glossop High Street was issued to DCC on 15 October 2021.	
RR-0240-3	Member Comments: Derbyshire County Council Consultation on the DCO application and supporting Environment Statement has been undertaken with Derbyshire County Council's Elected Members Becki Woods (Etherow Electoral Division), Jean Wharmby (Glossop and Charlesworth Electoral Division) and Daniel Greenhalgh (Glossop and Charlesworth Electoral Division) for their comments on the scheme. At the time of writing no comments have been received from Derbyshire County Council's Elected Members. Any Member comments subsequently received will be submitted to the DCO examination at a later date, particularly as part of the two council's joint Local Impact Report.		
RR-0240-4	Member Comments: High Peak Borough Council Specific comments from HPBC members will be included within the next phase of consultation on the DCO in the Local Impact Report.		



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-5	Officer Comments Highways Impacts • DCC, as Highway Authority for that part of the scheme that falls within High Peak Borough within Derbyshire, fully recognises the severe impacts of existing traffic flows on the highway network on the A628 and A57 and the associated adverse implications for the residents of Woolley Bridge in Derbyshire and Mottram Moor in Tameside and the wish for Highways England to address these issues. However, DCC is also concerned about the wider impacts of the Scheme on the highways network, particularly on the A57 through Glossop and A628 through Tintwistle.		
RR-0240-6	This is because the Scheme and its likely improvements to connectivity and reduction in travel times to and from the Manchester conurbation could potentially make it more attractive to road users in Derbyshire and consequently increase traffic flows with a corresponding reporting of future accidents on both the A57 through Glossop and A628 through Tintwistle.	The Scheme improves journey times along the A57 and as a result it is forecast that some traffic will reroute from alternative routes across the Pennines, including the M62, to take advantage of this. Consequently, the Scheme is forecast to result in an increase in traffic using the A57 Snake Road and the A628 through the Peak District National Park.	
		This Snake Road section (including Snake Pass) of the A57 through the Peak District National Park currently has a relatively poor accident record due to several factors including, the road alignment, frequent adverse weather due to its elevation and a higher than typical proportion of motorcyclists using the road, often for leisure purposes.	
		The accident appraisal for the Scheme assumes that where there are no proposed improvements to a section of road, the accident rate will increase in proportion to the forecast increase in traffic. It is, therefore, the forecast increase in traffic on the A57 Snake Road through the Peak District National Park due to the Scheme that results in the forecast increase in accidents on this section of the A57. However, the forecast increase in accidents equates to less than a 0.3% increase across the appraised road network.	
		The Scheme does not therefore make this section of the A57 inherently less safe.	
		A high proportion (c. 25%) of recorded accidents on the A57 Snake Road through the Peak District National Park involve motorcyclists. Motorcyclists are attracted to this section of the A57 because it offers an exciting and scenic ride due to the twisting alignment of the road through the National Park. The accident appraisal for the Scheme does not account for these very specific circumstances. It is therefore possible that the appraisal overestimates the forecast increase in accidents on this section of road, since it is unlikely that the proposed Scheme will materially change the number of motorcyclists attracted to Snake Road for leisure rides, which is one of the principal reasons for the current high accident rate.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Nonetheless, National Highways will collaborate with Derbyshire County Council to investigate what road safety improvements could be introduced on the A57 Snake Road through the Peak District National Park to reduce the potential for accidents in the future. However, any proposed improvements will not be included in the DCO for the Scheme since the A57 through the Peak District National Park is not a National Highways' road.	
RR-0240-7	Liaison is on-going with Highways England and their consultants to fully evaluate the likely highway and highway safety impacts of the scheme on the Derbyshire road network through the transport modelling evidence submitted as part of the Environment Statement.		
RR-0240-8	Issues have recently been raised by the two local authorities regarding the transport evidence that has been submitted with the DCO and further information sought from Highways England.	Please refer to National Highways' answer in respect of RR-0240-2.	
R4-0240-9	DCC's Officers have been liaising with Highways England's consultants regarding the detailed design and layout of the highway scheme, particularly the new signal-controlled junction between the new link road and the existing A57 at Woolley Bridge. This includes consideration of a proposed new consented housing development adjacent to the junction over which liaison has also taken place between Highways England's consultants, DCC's officers and the applicant for the housing development.	This is confirmed and the proposed access has been included within the design.	
R4-0240-10	With regard to the proposed design of the signal controlled junction on the A57 at Woolley Bridge, in discussions with Highways England's consultants, DCC's Network Management Officers have expressed some significant concerns about the design of the scheme, particularly the proposed inclusion of two lanes on the new link road that approach the new junction to turn right to head southwards on to the existing A57 which then also has two lanes that merge into one on the A57 after a relatively short distance. DCC's Officers consider that such a design raises safety issues with the merging of traffic down to one lane on a relatively short distance of highway and have requested that Highways England's consultants give this issue further thought as the County Council would prefer to see a more traditional one lane design solution for traffic turning right off the new road to head south towards Glossop, particularly if the County Council is being requested to adopt the new junction following completion of the scheme. Although these concerns remain, it is noted that Highways England has amended the junction design in the DCO submission so that there is now a longer stretch of two lanes heading southwards on the existing A57 before they merge into the single lane. It is Highways England's position that a two-lane design solution is required for capacity reasons.	This point has been discussed with Derbyshire CC and the effects of removing the two lane right turn described. Removing this additional turn will significantly reduce the capacity of the junction. As noted in the comment National Highways has added a longer length of two lane carriageway leaving the junction and introducing signing and road marking to safely allow vehicles to make this merge back to one lane. National Highways has also tracked the right turn with two parallel HGV's to ensure sufficient space is available and marked the centreline of the turn to help reinforce the separation.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-11	With regard to the proposed access to the consented residential scheme to the east of the new junction on the A57, discussions between each of the parties has established the principle of a mutually acceptable design solution for the junction, approval has now been given for the adoptable estate street, including its link to the new junction. A57 Street Lighting Design and Location	Noted, the agreed alignment has been included in the design proposals.	
RR-0240-12	DCC's Officers have been liaising with Highways England's consultants regarding the detailed design, specifications and location of street lighting for the scheme. Discussions are on going although the principle of the design, specification and location of the street lighting for the scheme has been agreed.	The Draft Statement of Common Ground (SoCG) with Derbyshire County Council (DCC) submitted as part of the DCO application (APP-191) includes a log of on-going discussions and states that National Highways shared the General Arrangement drawings regarding street lighting with DCC on 4 January 2021 and DCC provided their updated street lighting specifications to National Highways on 6 January 2021. A detailed design kick off meeting was held with DCC on 21 July 2021 at which street lighting was discussed.	
RR-0240-14	Air Quality • HPBC has designated Air Quality Management Areas on sections of the A57 at Dinting and on the A628 in Tintwistle. Our response to Highways England's public consultation in 2020 raised concerns about the impact of the scheme in the AQMA, particularly given that the PEIR had not considered the implications for these designations. This omission appeared to be on the basis that the changes in traffic flows with the scheme open were not sufficient to meet the screening criteria	The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with latest best practice guidance as set out in National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 air quality standard. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1). The traffic change criteria were applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A57 through the Glossop AQMA and the A628 through the Tintwistle AQMA. The extent of the ARN is presented in Figure 5.1 in the Environmental Statement (ES) (APP-076). The traffic change criteria are not exceeded for the A628 through the Tintwistle AQMA. For the Glossop AQMA the traffic change criteria are not exceeded for the A57 south of the Dinting Vale junction. The A57 north of the Dinting Vale junction and the A626 Glossop Road do exceed the traffic change criteria and the Dinting Vale junction, which is within the Glossop AQMA has been included in the air quality modelling presented in Chapter 5: Air Quality of the ES (APP-061). Where traffic change criteria are not exceeded this indicates that there would not be a significant adverse effect on air quality due to the Scheme in these locations.	
RR-0240-15	Unfortunately, the assessments submitted in support of the Development Consent Order application also omit consideration of the impacts on the AQMAs. The Council is keen to explore the basis for this by examining the underlying assumptions and projections in the traffic modelling. Seemingly, traffic is projected to avoid the A57 through Glossop town centre by taking alternative routes such as Shaw Lane.	The Dinting Vale Junction, which is within the Glossop AQMA, has been considered in the air quality assessment presented in Chapter 5: Air Quality of the ES (APP-061). Other parts of the Glossop AQMA and also the Tintwistle AQMA do not include sections of roads that trigger the need for further assessment of air quality as discussed above. (RR-0240-14).	



Response reference	Representation Issue	National Highways Response	Also Applies to
		The Scheme is forecast to result in an increase in traffic on Dinting Road and Shaw Lane. This route is currently a well-known and well-used alternative to the A57 through Glossop. This is because of traffic congestion and delays on Glossop High Street at certain times of day. The Scheme itself is not introducing any specific measures on this part of the network that would modify this traffic behaviour. However, the absolute increases in traffic flow due to the Scheme by 2040 are forecast to be relatively low at up to 91 vehicles per hour (less than 1 vehicle per minute each way) on Shaw Lane and up to 159 per hour on Dinting Road (less than 1 vehicle every 45 seconds each way). This part of the road network is outside of the Scheme boundary and it is, therefore, a matter for Derbyshire County Council to address issues of traffic using alternative roads to avoid traffic congestion on Glossop High Street.	
RR-0240-16	 DCC's Heritage Officers have reviewed the Heritage Chapter of the Environment Statement. DCC's key concern is the potential impact of the highway scheme on the setting of Melandra Castle, a Scheduled Monument that sits on high ground overlooking the proposed development to the southwest and the need to ensure that the potential impacts are adequately mitigated. Although DCC's officers have raised a number of issues regarding statements made in the Environment Statement relating to the potential impacts, notwithstanding this, Officers are supportive of the proposed mitigation measures set out in Table 6-5 of the Heritage Statement to help reduce the level of visual impact in the immediate setting of the castle. 	Noted	
RR-0240-17	 DCC's Landscape Architect has reviewed the DCO submission and considers that he has no substantial comments to add at this stage having been involved in this submission as part of an ongoing process. DCC's Landscape Architects considers that he is satisfied that the relevant documents have been referenced as part of the Landscape and Visual Impacts Assessment (LVIA) and that additional viewpoints he identified previously as being required during the PEIR consultation, specifically from residential properties at Woolley Bridge and from locations near Melandra Roman Fort, have now been included in the formal assessment. 	Noted	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-18	Ecology Comments • DCC's Ecologist considers that there are no ecological sensitivities immediately apparent, at least within the Derbyshire area relating to the scheme. Comments were made on the PEIR, when it was concluded that the ecological assessment appeared to be adequate in scope, robust in approach, and suitable with regards to the surveys undertaken. In this context, no further comments are provided on the Environment Statement submitted in support of the DCO application.	Noted	
RR-0240-19	 Climate Change DCC's Climate Change Officer has reviewed the Climate Change Chapter of the Environment Statement. A number of comments are made regarding the need for further detail or clarification about the potential impacts on climate change and proposed mitigation. These include: 		
RR-0240-20	There is a lack of reference to, and acknowledgement of, the Government's strategic priorities of reducing emissions, and increasing modal shift to active travel.	Chapter 14: Climate of the ES has considered the relevant legislation in force, however it did not include the DfT's Transport Decarbonisation Plan as this was published in July 2021, after the DCO application in June 2021. The plan outlines a number of commitments by the Government to remove all emissions from road transport to achieve net zero target by 2050. Commitments that will have a direct impact on road user emissions from the Scheme will include: • An end to the sale of new petrol and diesel cars and vans by 2030 • All new cars and vans to zero emissions at the tailpipe by 2030 • All new L-category vehicles to be fully zero emissions at the tailpipe by 2035 Current policy commitments mean that the greenhouse gas assessment presented in Chapter 14: Climate of the ES (APP-070) is considered to be an overestimate as the uptake of new electric vehicles in future years would be expected to be higher than the proportions used in the national projections included in Defra's Emissions Factor Toolkit (v10) used for the scheme assessment. Within the Emissions Factor Toolkit account is not taken for the increase of electric vehicles beyond 2030.	
RR-0240-21	The assessment does not take account of any potential opportunities for renewable energy installations and generation within the Scheme's boundary, which seems like a missed opportunity to explore options. Furthermore, there does not appear to be any mention of electric vehicle charging infrastructure and it is considered that there may be an opportunity for EV Rapid Hubs to be located along any proposed route.		



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-22	Vehicle emission factors take account of Department for Transport fleet projections including conventional vehicles (petrol and diesel) as well as hybrid and electric vehicles, but do not take account of government commitments to changes in fleet makeup, for example the phasing out of conventional fuel cars and vans by 2030.	The emission factors used for greenhouse gas (GHG) operational road traffic assessment were based on Defra's Emission Factor Toolkit (EFT) v10.1 published in Aug 2020. The emission factor projections go out to 2030. Summary information can be found via this link to the Defra website: https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/. Default fleet split assumptions, vehicle size distributions and Euro class compositions are based on a set of traffic activity projections from the Department for Transport (DfT) (Road Traffic Forecasts (RTF) 2018) and DfT car sale projections (April 2019) including the uptake of low carbon passenger cars and LGVs with electric and hybrid electric propulsion systems. All of these data sources for the fleet projections predate the announcement to end the sale of petrol/diesel vehicles by 2030 and updated to these data sources have not yet been published. Previously it was assumed zero emission was to be achieved by 2050. Current policy commitments, given below, mean that the greenhouse gas assessment is considered to be an overestimate as the uptake of new electric vehicles in future years would be expected to be higher than the proportions used in the national projections included in Defra's Emissions Factor Toolkit (v10.1) used for the scheme assessment. Within the Emissions Factor Toolkit account is not taken for the increase of electric vehicles beyond 2030. The DfT's Transport Decarbonisation Plan was published in July 2021. Commitments that will have a direct impact on road user emissions from the Scheme will include: An end to the sale of new petrol and diesel cars and vans by 2030 All new cars and vans to be zero emissions at the tailpipe by 2030	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-23	The assessment around road user impacts and traffic numbers does not appear to take into account changes to travel and work patterns brought about by the COVID-19 pandemic over the past 18 months, some of which are likely to be sustained in the long term, leading to more home working and flexi-time travel	The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and is based on the DfT's National Trip End Model (NTEM). The latest version of which predates the Covid-19 pandemic. National Highways recognises that the Covid-19 pandemic has, to date, had a significant effect on the people's travel patterns and traffic volumes using the road network. However, it is too early to know what the long-term impacts of the Covid-19 pandemic will be on people's travel patterns and particularly on forecast traffic growth. Until there is evidence of the likely longer-term impacts of the pandemic on peoples travel patterns that will enable revised traffic forecasts to be derived with some certainty, National Highways can only rely on the established method of forecasting traffic growth for the assessment of the Scheme that predates the Covid-19 pandemic. However, as set out in the Case for the Scheme (APP-182), the Scheme Appraisal does take account of lower forecast economic growth due to Covid-19.	RR-0133, RR-0182, RR-0211, RR-0286, RR-0334, RR-0415, RR-0535, RR-0571, RR-0794, RR-0796, RR- 0892
RR-0240-24	 DCC's Flood Team Officers have reviewed the Environment Statement and consider at this stage they are not able to fully comment on the flood risk implications of the scheme as there is no drainage strategy available to assess and it is too early in the process for the developer to have designed this. Officers will therefore provide fuller comments later on in the DCO process. 	Noted. Consultation with all relevant authorities is ongoing for this topic.	
RR-0240-25	Accessibility / Public Rights of Way Issues • DCC's key concerns relate to the connectivity of the highway scheme with the surrounding Public Rights of Way network, particularly the Trans-Pennine trail that runs close to the eastern boundary of the scheme adjacent to the River Etherow and existing A57 Wooley Bridge. Officers welcome and support the proposed design of the link road, which includes provision of a new footpath/cycle path running alongside the south-side of the new highway link road to Mottram Moor. Clarification is required, however, whether the footpath / cyclepath would also be used for horse riders.	In response to the request for clarification we can confirm that the new provision running along the south side of the new highway link road to Mottram Moor would be suitable for horse riders. Chapter 12: Population and Human Health of the ES (APP-068) concludes that these proposals are associated with a Positive Health Outcome and Moderate Beneficial effects for walkers cyclists and horse riders, which is significant. During operation, provision of improvements on the existing A57(T) and A57 with the possible inclusion of cycle lanes, improved pedestrian and cyclist crossing facilities at the M67 Junction 4, and all new junctions created by the Scheme, upgrading of the PRoW LON 52-20 from a footpath to a bridleway, increasing the availability of suitable equestrian facilities away from road traffic and creation of a combined footway and cycleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans-Pennine Trail (National Cycle Network route 62).	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0240-26	 Officers also welcome the connection of the new footpath / cyclepath with the Trans-Pennine Trail where it emerges alongside the River Etherow adjacent to the existing A57. This was an issue raised with Highways England on its PEIR consultation in 2020 and has now been addressed in the DCO submission. 		
RR-0240-27	 • DCC's Officers consider that, overall, the scheme and its supporting documentation makes sound provision with regards to waste infrastructure and waste management issues and makes appropriate reference to the waste hierarchy. The waste hierarchy is key as the scheme is likely to involve a large amount of earth works and aggregate and stone excavation and usage as the scheme progresses. As much of this material should be utilised on site and as part of the scheme as possible - if this is carried out then only minimal amounts of residual waste should need to find a home within local waste infrastructure. 		
RR-0240-28	 We are keen to determine the implications of the scheme to the local economy. This theme will be considered as part of our Local Impact Report. HPBC has commissioned a Masterplan for the Glossop Gateway corridor from Woolley Bridge into Hadfield and Glossop town centre along the A57 with a view to maximising any potential opportunities and benefits which may arise from the scheme. However, as outlined above, this work cannot conclude without further consideration of the traffic flows. 	The traffic data referred to has now been provided as per the response to RR-0240-2.	
RR-0240-29	 Land Interests For the record, HPBC has land interests which are relevant to the scheme, namely land on the western side of the A57 at Brookfield, Glossop. The land in question forms part of the gateway to the Trans Pennine Trail. The applicant is aware of this interest. Yours Sincerely Neil Rodgers Executive Director Place – High Peak Borough Council Chris Henning Executive Director Place – Derbyshire County Council" 		



RR-0677 Peak District National Park Authority

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0677-1	"The Peak District National Park (PDNP) lies to the east of the scheme; therefore, none of the works have a direct impact. However, the Environmental Statement (ES) raises concerns for the Peak District National Park Authority (PDNPA) regarding the indirect effects of the scheme. These effects are due to increased traffic flows, principally on the A628 Woodhead and A57 Snake Passes. Forecasts indicate that the A628 Woodhead Pass will see a daily increase in traffic of 850-950 vehicles (2025) and 900-1,100 vehicles (2040); the A57 Snake Pass will see an increase in vehicles of 1,150 (2025) and 1,450 (2040). This growth in traffic may negatively affect the Special Qualities of the PDNP, whilst impacting on the achievement of the Authority's Statutory Purposes (Section 61, Environment Act, 1995).	The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP–185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road. However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys. The effects on the Special Qualities of the PDNP are considered further in the responses below.	RR-0096, RR-0131, RR-0448, RR-0526, RR-0244, RR-0540, RR-0543, RR-0589, RR-0604, RR-0605, RR-0713, RR-0720, RR-0739,



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0677-3	We have concerns regarding the effects of the scheme on the following: - 1) Air Quality a) Tintwistle AQMA –is acknowledged within the ES, however, there is no assessment of the effects of the predicted increased traffic flows on it. b) Designated sites (A628) – are already subject to high traffic flow and associated Nitrate deposition. Whilst predicted increased flows for 2025 do not meet the 1,000-vehicle threshold, we believe that an assessment of impact should have been undertaken.	The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with the National Highways Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard, which ensures that the scheme can demonstrate compliance with the NN NPS. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The key traffic change criteria are the flow change criteria - a change of over 1000 AADT and a change of over 200 HDV with the Scheme compared to without the Scheme in the Scheme opening year of 2025. The traffic change criteria has been applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A628 through the Tintwistle AQMA and ecological designated sites. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP -076). The traffic change criteria are not exceeded for the A628 through the Tintwistle AQMA or for sections where there are ecological designated sites adjacent and as a result is not included in the air quality assessment. Where traffic change criteria are not exceeded on roads they are not considered further in the air quality assessment. It is considered that impacts from a scheme on traffic flows below, this criteria is not considered to be significant.	RR-0818
RR-0677-4	2) Cultural Heritage a) Tintwistle Conservation Area (TCA) – will see a slight increase in traffic. The ES suggests a 'non-significant, neutral, residual effect'. This will, however, have an adverse effect on how the TCA is experienced.	In their consultation response on the Scheme, and during consultation undertaken in December 2020, the Peak District National Park Authority (PDNPA) stated that they would like to see Tintwistle Conservation Area included in the assessment due to the potential for impacts as a result of changes in traffic levels. Concern was also raised by PDNPA regarding the impact of changes to traffic flow within the PDNP and the potential for impacts on the settings of designated heritage assets. The conservation area was therefore included as part of the cultural heritage	
		baseline, and the potential for impacts upon its significance as a result of construction and operation of the Scheme assessed.	
		The assessment concluded that the operation of the Scheme would very slightly increase traffic on the A628 through the conservation area (refer to Appendix 2.1: Traffic data (APP-151)). No change would result within the conservation area to the north and south of the A628, with the characteristic millstone grit terraces and long views to the surrounding landscape maintained in their current condition.	
		The A628 was originally constructed as a turnpike road in 1800 and has formed an element of the historic townscape of Tintwistle since this time, shaping the growth and development of the settlement. Conservation Area Appraisals produced by both High Peak District Council and the PDNPA recognise traffic on the A628 to form a prominent existing feature of the conservation area in this	



Response reference	Representation Issue	National Highways Response	Also Applies to
		area. The predicted negligible increase in traffic along the A628 would not result in any perceptible change to this character, appearance or noise environment of the conservation area, which is a heritage asset of medium value. Considered against the criteria for assessment of magnitude of impact presented at Table 3.4N in the Design Manual for Roads and Bridges (DMRB) LA 104 Environmental Assessment and Monitoring, this would constitute a very minor loss or detrimental alteration to the conservation area, consistent with a negligible adverse impact, as this would not result in a measurable change to the character	
		or appearance of the conservation area.	
RR-0677-5	b) Heritage Assets (A57) – the increase in traffic on the Snake Pass is significant (38%). The ES (Table 7.32) describes this as a 'slight increase' (VP23) indicating no change to the Special Qualities of the PDNP. Heritage assets are part of the attraction for people to the area. They include the	For designated heritage assets, such as the scheduled monuments referred to in the Relevant Representation, that are located along the affected road network (ARN) within the remainder of the Peak District National Park, noise and visual intrusion from the movement of traffic already forms an element of their setting.	
	Ladybower Reservoir and a significant cluster of scheduled monuments (Hordron Edge, Bamford Edge, Crook Hill and Bridgend Pasture). Increased traffic flows could impact adversely on the enjoyment and experience of these important monuments within their landscape setting.	Noise changes as a result of alteration of traffic levels on the ARN would not generally be perceptible, and as identified in Chapter 11: Noise and Vibration of the Environmental Statement (APP-067) para. 11.9.87, changes in noise along the ARN as a result of the Scheme's operation would be very limited.	
		These limited changes would not result in any impact on the significance of or ability to appreciate the significance of designated heritage assets, including the scheduled monuments identified, along the ARN. No potential for impacts on the setting of designated heritage assets as a result of increased traffic on the ARN through the Peak District National Park has therefore been identified.	
		Viewpoint 23 (approximately 400m from the A57 within the open exposed moorland within the PDNP) is represented in Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063), Table.7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP which addresses both tranquillity and wildness. For the visual receptors at this viewpoint location the magnitude of change of increased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity) and was judged to be barely perceptible. The significance of effect is neutral.	
		As per the assessment methodology for indirect effects on the PDNP for landscape and visual (discussed at virtual meeting with the PDNPA on 26 January 2021), the changes in traffic were considered in terms of its effect on landscape and visual receptors not the setting of heritage assets.	
RR-0677-6	3) Landscape and visual We are concerned with how the indirect landscape impacts (increased traffic flow) of the scheme have been assessed. National Policy seeks to ensure that road schemes and their effects are thoroughly assessed to avoid or minimise impacts on NPs. We don't believe that appropriate landscape receptors have been adequately defined at the correct level of detail to determine indirect	Following a meeting with PDNPA (26 January 2021) a draft indirect assessment methodology was provided to the PDNPA (19 February 2021). The assessment was undertaken by a Chartered and experienced landscape architect within the framework of DMRB / Guidelines for Landscape and Visual Impact Assessment, 3 rd edition (GLVIA3) and was balanced with the assessment of direct effects. GLVIA3 recognises within paragraph 2.23 that 'professional judgement is a very	



Response reference	Representation Issue	National Highways Response	Also Applies to
	landscape effects (on character and perceptual aspects such as tranquillity, wildness, remoteness etc) within the PDNP. Where negative impacts have been recognised, 'slight adverse' effects are not considered to be material. In the case of NPs we believe that slight adverse effects are a material consideration. This is particularly pertinent due to the cumulative harm caused by additional traffic flows on what are already busy roads through affected valleys.	important part of LVIA. While there is some scope for quantitative measurement of some relatively objective matters much of the assessment must rely on qualitative judgements'. Landscape receptors are landscape designations, Landscape Character Types, and parts of the A57, A624 and A628 within the PDNP. Indirect effects upon the PDNP resulting from increased traffic were assessed. Perceptual/experiential effects were included within the methodology. Paragraphs 7.3.39 and 7.3.40 of the Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063) considered the Special Qualities of the PDNP and tranquillity and wildness. Remoteness was considered as part of the key characteristics of the Dark Peak Landscape Character Area in ES Chapter 7 Table 7.27. ES Chapter 7 Table 7.29 Indirect Effects recognised that traffic numbers will increase for A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity), was not high enough to result in significant effect greater than slight adverse. National Highways can confirm that the PDNP has been assigned the highest value possible within the ES to meet DMRB requirements (as set out in the ES Table 7.11). The assessment was undertaken within the framework of DMRB / GLVIA3 and was balanced with the assessment of direct effects. While all impacts are a material consideration appropriate weight should be attributed to an impact defined as slight adverse (which is not significant).	
RR-0677-7	4) Biodiversity a) Nitrate deposition –see point 1b.	Please refer to National Highways' response for R-0677-3.	
RR-0677-8	b) Noise disturbance and wildlife collision – have been screened out for the A628 SPA/ SAC. However, increases in traffic, especially HGV's, will create more constant noise and provide less breaks in the traffic, meaning that there is likely to be more potential for collision. The fragmentation of habitat will also lead to more collision risk and fatalities. Increased roadkill will attract more predators and has the potential to impact on ground nesting birds. The increase in background noise generated by additional traffic is also likely to add to the general disturbance of ground nesting birds, potentially reducing the area of usable habitat. We believe that these impacts should be reassessed taking the above into account.	Chapter 11: Noise and Vibration of the Environmental Statement (APP–067) includes an assessment of road traffic noise levels from the A628 during the operation of the A57 Link Roads Scheme. The modelled traffic flows on the A628 through the Peak District National Park were not predicted to cause a perceptible change in noise levels in the short or long-term. This road passes through the Dark Peak SSSI, South Pennine Moors SAC and Peak District Moors SPA.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make the A628 a more attractive route for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A628, which means that traffic flow, with the Scheme, is forecast to increase. The additional forecast traffic flow due to the Scheme represents approximately an increase from 10,700 to 11,650 in annual average daily traffic (AADT) flow on the A628 by 2025. The Scheme is not anticipated to result in any significant increases in HGVs. With the already high number of vehicles using the roads (10,700 AADT), it is considered that the A628 already has high levels of existing usage with any species already habituated to background noise levels and usage, therefore, it is not considered that the modelled increase in vehicles using the A628 within the Peak District National Park would result in significant increases in fragmentation, roadkill, or wildlife collisions.	
		A detailed assessment has been provided within the Habitats Regulations Assessment Screening Report (APP-054) whereby impacts from noise and road collisions were assessed regarding the qualifying species of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA). Qualifying species (of which are all ground nesting birds) mortality from vehicular collision within the SPA is not recognised as a vulnerability of the European Site and it is anticipated that such species will be habituated to the existing roads that are already heavily used. Therefore, it is not considered that there would be any significant increases in noise and is not considered likely to lead to significant increases in wildlife collision above the existing background level. Any likely significant effects upon designated sites for nature conservation from the Scheme have been screened out within the Habitats Regulations Assessment Screening Report (APP-054) and within the Environmental Statement (APP-058 -073).	
RR-0677-9	5) Noise and vibration a) Effects on designated sites –see point 4b	Please see National Highways' response to point 4 b)	
RR-0677-10	b) Effects on quiet enjoyment –existing traffic levels on the A628 Woodhead and A57 Snake Passes have a negative impact on the tranquillity of the surrounding open countryside, with traffic noise being a major feature. Increased levels of traffic along these routes will further reduce tranquillity, especially for those using the trails or footpaths that parallel or cross these busy roads (e.g. Pennine Way, Pennine Bridleway, Trans Pennine Trail (TPT)).	Chapter 11: Noise and vibration of the Environmental Statement (APP-067) includes an assessment of road traffic noise levels from the A628 and A57 with the Scheme and impacts to users of footpaths within the PDNP (paragraphs 11.9.86 to 11.9.89). The modelled operation phase traffic flows on the A628 at Tintwistle and Woodhead through the PDNP were not predicted to cause a perceptible change in noise level in the short or long-term. The A628 is adjacent to the Trans-Pennine Trail and crosses the Pennine Way; impacts on these footpaths would be negligible from changes in traffic on A628.	RR-0697



Response reference	Representation Issue	National Highways Response	Also Applies to
		Traffic flows on A57 Snake Pass and A57 Snake Road, which cross the Pennine Way, would increase to give a perceptible noise increase in the short-term, however by the future year the increase would have a negligible impact according to DMRB LA 111 criteria. Therefore noise levels in these areas near the A57 would perceptibly increase in the short-term, and the impact would be limited to within approximately 10m of the road and not the entirety of the PDNP.	
		Landscape receptors are landscape designations, Landscape Character Types, and parts of the A57, A624 and A628 within the PDNP. Indirect effects upon the PDNP resulting from increased traffic were assessed. Perceptual/experiential effects were included within the methodology. Paragraphs 7.3.39 and 7.3.40 of the ES (APP-063) consider the Special Qualities of the PDNP and tranquillity and wildness). There were no significant residual effects on the landscape character areas/types within the PDNP during operation.	
		Viewpoints 19-26 inclusive represent views from the Pennine Way/Pennine Bridleway/Trans-Pennine Trail within the Peak District National Park (PDNP). These were set out in Chapter 7 Landscape and Visual Effects of the Environmental Statement (APP-063) Table 7.29 Indirect Effects. This recognises that traffic numbers will increase for the A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity (the PDNP's Special Qualities)), was not high enough to result in significant effect greater than slight adverse for visual receptors on these routes.	
RR-0677-11	6) Population and health a) Severance –the A628 Woodhead and A57 Snake Passes are crossed at various points by footpaths and trails (see 5b). Crossing points are already difficult and, any increase in traffic for either route is likely to worsen conditions. Loss of tranquillity and increased severance will negatively affect the enjoyment of the PDNP by users of these routes, with an adverse impact on the Authority's second statutory purpose.	It is to be noted that there will be no direct construction effects on the A628 Woodhead Road or the A57 Snake Pass and there is no requirement to close, divert or adjust in any way walking routes in this area during this period. It is also important to note that during operation, there will be no diversion of routes, or increase in route length, for WCH in the vicinity of A628 Woodhead or A57 Snake Pass. However, it is recognised that there may be an increase in traffic in these areas. For example, the increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP–185). While this increase in traffic volumes is likely to worsen conditions in respect of road crossing, consideration of the requirements of DMRB LA 112 Population and Human Health shows that negative effects are not anticipated to be to a significant level. Please refer to National Highways' response to the Relevant Representation made by the Peak District National Park Authority (RR-0677-10) in relation to the issue of reduced tranquillity for visual receptors on/in close vicinity to the A628 and A57 Snake's Pass.	RR-0467-2



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0677-12	b) Road safety – the ES indicates that the scheme will result in an increase in RTCs along the Snake Pass. Given the geography of the road it's is likely that any collisions are more likely to be severe than slight. The human cost of such events is devastating for those involved. It is also likely that any increase in collisions will require remedial works that will in turn negatively impact on the landscape of the PDNP. 7) Climate The ES contains detailed consideration of the physical effects of alimate above as the separate that appear rebust and therough. However,	Please refer to Derbyshire County Council Response [RR-0240-6] Potential impacts arising from remedial works was not part of the scope of the landscape assessment. No reference to remedial works was made in the DMRB LA 107 standard. Any remedial works on Snake Pass for any reason would be the responsibility of the local highway and local planning authorities. Chapter 14: Climate of the ES (APP-070) has been prepared in accordance with DMRB LA 114, the National Policy Statement for National National National Policy Statement for National National National Policy Statement for National Nati	
	climate change on the scheme that appear robust and thorough. However, consideration of the schemes contribution to climate change is not analysed with an equivalent rigour. The summary of the effects of the scheme on Climate Change appear simplistic and do not offer an adequate assessment; as it is inevitable that almost all individual site or project-based greenhouse gas emissions will appear insignificant when compared to the National Carbon Budget and reduction targets. By extension, it also suggests that all individual GHG emissions can be ignored due to their relative scale when compared to National Targets; an approach which would not be considered acceptable in other areas of activity. The summary suggests that the scheme in isolation is unlikely to produce significant effects on the climate. However, it should not be considered in isolation but as part of an accumulative process that is changing the climate and damaging the environment. We would suggest that a more local assessment of impact is undertaken to consider the emissions in relation to those who are likely to benefit from the scheme and the immediate area where its impact will be felt, would be more appropriate.	DMRB LA 114, the National Policy Statement for National Networks (NN NPS), the Climate Change Act (2008) and subsequent legislation including reporting on the Sixth Carbon Budget The assessment of greenhouse gases across the lifecycle of the scheme has been used to inform mitigation to reduce carbon emissions. Mitigation measures include exploring the potential for low carbon solutions (including technologies, materials and products) to minimise resource consumption and reusing and / or refurbish existing assets to reduce the extent of new construction. Minimising the effects of the Scheme on climate change in this way includes applying the carbon reduction hierarchy: Avoid/prevent, Reduce and Remediate. To fully embed the carbon reduction hierarchy in the project team's ways of working, they have committed to look at ways to reduce carbon emissions across the whole life of the project. Further details of the proposed mitigation measures are provided in section 14.8 of Chapter 14: Climate of the ES (APP-070). Our approach to assessment is in line with the National Policy Statement for National Networks. The NN NPS, Paragraph 5.17 states that applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets. While noting that 'it is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet the targets of its carbon reduction plan targets', Paragraph 5.18 goes on to state that "any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets". As explained in section 14.9.12 of Chapter 14: Climate of the ES (APP-070), the assessment makes a comparison with national carbon budgets and shows that: the overall (net) residual effect of the scheme in the fourth carbon budget period is a 0.0028% c	
		Local Carbon Budgets as defined by local or regional bodies are not defined in the relevant National Policy Statement for National Networks, nor in the Climate Change Act or any dependent legislation. These are not therefore considered to	



Response reference	Representation Issue	National Highways Response	Also Applies to
		be of relevance when it comes to examining the suitability of the proposed Scheme for its impact on ability to reduce carbon emissions.	
		The assessment of greenhouse gases in the Climate chapter is inherently cumulative because:	
		 it considers embedded construction and maintenance, and user tailpipe emissions 	
		 the cumulative assessment of different projects (together with the project being assessed) is inherent within the climate methodology through: 	
		inclusion of the project and other locally committed development within the traffic model	
		consideration of the project against the UK carbon budgets, which are inherently cumulative as they consider and report on the carbon contributions across all sectors	
RR-0677-14	8) Cumulative Impacts Our submission focusses on the indirect impacts of the scheme on the PDNP. Some of these impacts have been assessed as minor or insignificant within the ES. However, we are particularly concerned about the cumulative impacts of the scheme on the following: -a) Tintwistle – increased traffic flows through the village are likely to worsen air quality and noise & vibration; increase severance and effect experience of the TCA.	For Air Quality please refer to the National Highways response given for RR-0677-3. In Tintwistle, traffic flow increases on New Road and Waterside would lead to perceptible increases in noise in the short-term and long-term. Noise sensitive receptors adjacent to these roads would experience a minor or negligible increase in road traffic noise. Negligible increases are predicted on the A628 Manchester Road and A628 Woodhead Road in the short-term and long-term. No significant effects from vibration would occur. For Tintwistle Conservation Area please refer to the National Highways response given for RR-0677-4.	
RR-0677-15	b) Designated sites – increased traffic flows are likely to increase nitrate deposition, noise disturbance and collisions with wildlife. It is of particular concern that the effects of the increase in traffic on the A628 have not been assessed in relation to these impacts.	Please refer to National Highways response for RR-0677-3.	
RR-0677-16	c) Quiet enjoyment – increased traffic flow will affect both tranquillity and the quiet enjoyment of the landscape. It is also likely to negatively affect the use of important multi-user routes due to the increased difficulty of using crossing points."	Indirect effects upon the PDNP resulting from increased traffic were assessed including the perceptual/experiential effects. Chapter 7 Landscape and Visual Effects of the Environmental Statement (APP-063) Paragraphs 7.3.39 and 7.3.40 consider the Special Qualities of the PDNP and tranquillity and wildness. No significant effects were predicted on the landscape receptors within the PDNP. This was because tranquillity and quiet enjoyment is currently compromised by existing traffic and therefore the significance of effect was considered to be neutral. ES Chapter 7 Table 7.29 Indirect Effects recognises that traffic numbers will increase for A57 and A628 (within the PDNP) and decrease for the A624 (within	



Response reference	Representation Issue	National Highways Response	Also Applies to
		traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity), is not high enough to result in a significant effect greater than slight adverse.	
		Viewpoints 19-27 inclusive are represented in Table 7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP and address both tranquillity and wildness. For the visual receptors at these viewpoint locations the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity and quiet enjoyment), was not high enough to result in a significant effect greater than neutral. This is similar to baseline levels. The viewpoints represent visual receptors on the Pennine Way, and Trans-Pennine Trail - NCN62.	
		For effects on users of the crossing points please see response RR-0677-11.	



RR-0861 Tameside Metropolitan Borough Council

Response reference	Representation Issue	National Highways Response	Also Applies to:
RR-0861-1	"Tameside Metropolitan Borough Council wishes to register to participate in the examination regarding the application by Highways England for an Order Granting Development Consent for the A57 Link Roads scheme (previously known as the Trans-Pennine Upgrade). The A57 Link Roads scheme broadly supports the aim of the Tameside Corporate Plan to ensure modern infrastructure and a sustainable environment and the policy aims of the Council's Inclusive Growth Strategy (2021) and the Council's growth priorities. The current scheme has evolved over more than 50 years as alternative ideas have been explored to address the heavy congestion on the A57 and A628 strategic roads between Manchester and Sheffield, currently resulting in unreliable journeys, poor air and noise quality and a general blight on communities The Council is currently finalising its Local Impact Report (LIR) against the headings noted below:	National Highways notes the initial comments of Tameside Metropolitan Borough Council (TMBC) and awaits the TMBC Local Impact report (LIR) which we will respond to in due course.	
	Economic Growth and Transportation, especially around:		
	 Existing key businesses in and around the A57 including the Hattersley, Mottram, Hollingworth and local area; 		
	 Existing and potential strategic Housing Sites in the local area to include areas around Hattersley, Hyde and Godley Green; 		
	 The proposed Bredbury Industrial Estate on the Tameside/ Stockport boundary; 		
	 The effects of the initiative on land values / commercial property rental values at employment sites in and around the A57 as noted above; 		
	 Existing areas of underutilised economic development potential along the A57 corridor; 		
	The benefits of the new initiative forming the first stage of a wider road programme around Mottram, Hollingworth and Tintwistle.		
	- Noise and Vibration -		
	- Geology, Soil and Ground Condition as a result of the proposed scheme		
	Material impacts on the scheme -		
	Air Quality especially linking in with the developing Greater Manchester Clean Air Plan		
	- Landscape and Visual Impacts		
	- Archaeology and Cultural Heritage		
	- Ecological and Nature Conservation		



Response reference	Representation Issue	National Highways Response	Also Applies to:
reference			
	- Road Drainage and Water Quality		
	- Construction Traffic		
	- Road Safety		
	Once completed the LIR will be submitted to the examination to enable the Council to give further details of the likely positive and negative impacts of the proposed development in Tameside."		

Part 2 – Parish Councils



RR-0244 Derwent and Hope Woodlands Parish Council

Response reference	Representation Issue	national highways Response	Also
RR-0244-1	"The link road will cause an increase in traffic along the A57 Snake Pass. The Snake Pass is subject to subsidence because parts of it are built on shale banks and the road is regularly closed to repair it. An increase in traffic will exacerbate this continuing problem. There are already many accidents on the Snake Pass and these will also increase in number with more traffic on the road. Road subsidence also causes accidents. (There have been three in the last month due to a dip in the road near the Snake Inn.)	Please refer to National Highways' response to the Relevant Representation made by Derbyshire County Council in relation to road safety (RR-0240-6) Please refer to National Highways' response to the Relevant Representation made by the National Trust in relation to road subsidence (RR-0620-5)	
RR-0244-2	The road is often closed for hours at a time to clear up these accidents and the link road will only add to this problem. More wildlife will be killed on The Snake as the number of vehicles increases.	Please refer to National Highways' response to the Relevant Representation made by the Peak District National Park Authority in relation to impacts on wildlife (RR-0677-8).	
RR-0244-3	The Snake Pass is used as a race track by cars and motorbikes both day and night. The link road will make the road more accessible to such users."	Appropriate enforcement of speed limits is a matter for the Derbyshire Constabulary.	



RR-0809 Bamford with Thornhill Parish Council

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0809-1	"The proposed scheme divides public opinion. The Council remains concerned about potential safety and environmental impacts from the scheme, caused by greater traffic volumes using the Snake Pass; it would like to see more evidence about other possible options."	Please see National Highways' response to the Relevant Representations made by Derbyshire County Council in relation to potential impacts on road safety (RR-0240-6). Please see National Highways' response to the Relevant representation made by the Peak District National Park in relation to the Scheme's environmental impacts on the National Park (RR-0677).	

Part 3 – Statutory Consultees



RR-0621 Natural England

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0621-1	Natural England has no objection to the project for the following reasons:		
RR-0621-2	Natural England's advice in these relevant representations is based on information submitted by Highways England in support of its application for a Development Consent Order ('DCO') in relation to the project.		
RR-0621-3	1.2.Natural England has been working closely with Highways England to provide advice and guidance since2017. Natural England has also been working with the Peak District National Park Authority to provide coordinated advice. Natural England has undertaken a number of meetings with Highways England and their ecological consultants at various points between 2017 and 2021 as well as assessing submitted draft ecological reports and associated evidence and data which have been submitted as part of the scheme. This has enabled Natural England to develop a Statement of Common Ground with Highways England which agreed that there would be no significant impacts on any SSSI's or SAC's/SPA's. Advice has also been provided on European Protected Species.		
RR-0621-4	 1.3. These relevant representations contain a summary of what Natural England considers the main nature conservation issues to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have further or additional points to make, particularly if further information about the project becomes available.] 1.4.Natural England has worked successfully with Highways England and there are no substantive outstanding matters. 1.5.The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process. 		
RR-0621-5	2.The natural features potentially affected by this application 2.1.The designated sites relevant to this application are .2.1.1.TheSouth Pennine Moors Special Areas of Conservation (SAC) and Peak District Moors Special Protection Areas (SPA) 2.1.2.TheDark Peak Site of Special Scientific Interest (SSSI) and Huddersfield Narrow Canal SSSI. 2.2.The following Europeon protected species maybe affected by the proposed project: •Bats		



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0621-6	2.3. The main issues raised by this application are whether the scheme will directly or indirectly lead to increases in traffic on roads within the Peak District National Park and which could lead to associated air quality impacts on habitats for which an increase in traffic that could lead to air quality impacts on habitats for which The South Pennine Moors SAC and Peak District Moors SPA, Dark Peak SSSI and Huddersfield Narrow Canal SSSI could be affected. Chapter 5 Air Quality of the Environmental Statement should provide Traffic Modelling data that must be considered before any determination is made.		
RR-0621-7	3.1.1. The applicant has submitted a thorough Environmental Statement which we are satisfied demonstrates beyond reasonable scientific doubt that there would be no significant effect on the integrity of the European site.		
RR-0621-8	3.1.2. Natural England is satisfied that the project is unlikely to have a significant impact on the nearby Dark Peak and Huddersfield Narrow Canal SSSI's.		
RR-0621-9	3.1.3. The project site currently supports habitats of negligible ecological interest and all protected species issues (including any licensing requirements under the Habitats Regulations or the 1981 Act) can be addressed by the proposed draft DCO requirements.		
RR-0621-10	3.1.4. Natural England welcomes the use of the Defra Biodiversity Metric 2.0 Calculation Tool105 to design and achieve a net gain for area-based habitats and which are set out within Appendix 8.1 of the Environmental Statement. This will have a positive effect on the natural environment. This is in accordance with the principles set out in paragraph 170 of the National Planning Policy Framework.		
RR-0621-11	Natural England notes that this commitment is reflected in proposed Requirement TR010034/APP/7.2 and (TR010034/APP/7.3 of the draft DCO. Natural England therefore advises that this requirement should be secured by a suitably worded requirement in the DCO, if the project is approved.	The commitments in the Outline Environmental Management Plan (APP-183) and the Register of Environmental Actions and Commitments (APP-184) are secured through Requirements 4 and 5 of the draft DCO (APP-020).	
RR-0621-12	3.2 Natural England's headline points are that on the basis of the information submitted:		
RR-0621-13	3.2.1. Natural England is satisfied that there will be no Likely Significant Effects on Internationally Designated sites both alone and in combination and that there will be no significant impact on any Nationally Designated sites should it proceed as detailed in the submitted documents.		



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0621-14	3.3.2 Natural England advises that, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently mitigated.		



RR-0814 Sport England

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0814-1	"The line of the link road/construction activity appears to affect a disused cricket ground, shown on the aerial image below and also shown on the red line boundary plan between Old Mill Farm Underpass and Mottram Underpass. This shows a proposed watercourse/ditch cutting across the north west corner of the cricket ground, although the video fly through shows the cricket ground will be unaffected. If the final development results in the loss of any part of this site this would prevent the site from being brought back into use should it be required to meet an identified need for pitch sports, either cricket or another pitch sport. It should be noted that Sport England's remit is not purely to protect those playing fields that are currently in use but also those that are disused that could be protected and brought back into use to meet an identified need in future. Sport England applies its policy to any land in use as playing field or last used as playing field and which remains undeveloped, irrespective of whether that use ceased more than five years ago. Lack of use and poor quality should not be seen as necessarily indicating an absence of need for playing fields in the locality. Such land can retain the potential to provide playing pitches to meet current or future needs. With respect to disused /lapsed playing fields it should be emphasised that the lawful planning use of a lapsed site is still that of a playing field until such time as there is a formal change of use or development occurs, nor is there a positive obligation (under planning law) for any playing field to be actively used as such. Tameside Council are currently preparing a new Playing Pitch Strategy which will determine whether there is sufficient pitch provision or a deficit. This is the relevant Needs Assessment that informs whether a playing field is surplus to meet a community sport requirement, or should be replaced to meet an identified community sport need. As there is no evidence the site is surplus to requirement to meet paragraph 99	As set out in the Common Land and Open Spaces Assessment (COSA) included as Appendix D to the Case for the Scheme (APP-182) the cricket pitch has been disused for at least 14 years. This area of land was recorded on 9 February 2007 within the Highways Agency's Compulsory Purchase Order as a 'disused cricket ground'. It is understood that prior to this, the site was used by Staley St Paul's Cricket Club, which is now located at Gorse Hall Road, Dukinfield SK16 5HN. Staley St Paul's Cricket Club when it folded. The landowner has confirmed that the area that was previously the cricket pitch is used for agricultural purposes and has been for some time. As indicated in the table in Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 paragraph (z)(ii)(aa) the former cricket pitch falls outside of Sports England's statutory remit as its last known use as a playing field was more than five years ago. Photographic evidence included in the COSA demonstrates that the site has not been used as a cricket pitch for more than 14 years and does not support any other public recreation. Further evaluation of the site of the former cricket pitch, confirms the following: • The Tameside Playing Pitch Strategy 2010 did not list the Site to the rear of Four Lanes as a cricket pitch; only the following three sites within Longdendale (where the Site is located) were included in the Strategy: Broadbottom CC, Mottram Road; Mottram CC, Broadbottom Road; and Spring Street. • The Tameside Playing Pitch Strategy 2015-2025 (2016) does not list the Site. • The TMBC Unitary Development Plan (2004), as shown on the UDP Proposals Map, does not designate or allocate the Site as a playing field. The Site falls within a wider Green Belt designation. The area is identified within the Tameside Open Space Review 2018 the Site's typography to be 'Natural space and countryside', with its primary purpose described as 'wildlife conservation, biodiversity and environmental education and awareness'. The	

Part 4 – Utilities



RR-0110 Cadent Gas Limited

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0110-1	Protective Provisions The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent will require its protective provisions to be included within the DCO. This is the position with all of the Applicant's NSIP projects. Cadent has been in detailed discussion with the Applicant over the form of protective provisions in relation to a number of schemes which are now agreed and are appended at Appendix 1.	Protective provisions for the benefit of Cadent have been included in the draft DCO. Discussions with Cadent have taken place and will continue and the wording of the protective provisions may need to be updated to reflect agreement reached on other National Highways projects.	
RR-0110-2	As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.		
RR-0110-3	Diversions & Land Rights Cadent has low and medium pressure gas pipelines and associated apparatus located within the order limits which are affected by works proposed and for which the DCO proposes two diversions referenced as work numbers 62 (low pressure) and 63 (medium pressure). Cadent will also be installing a new reinforcement pipeline parallel to the existing medium pressure pipeline, and the diversion of this reinforcement pipeline will also need to be secured through work number 63. Having reviewed the draft DCO documents Cadent is not satisfied that the DCO includes adequate land rights for work number 63 (the diversion of a low pressure main) over plots 5/1b, 5/1d, 5/1f, 5/1i and 5/4 and is currently in discussion with the Promoter to resolve concerns. Furthermore, Cadent cannot be satisfied that the DCO includes adequate land rights required to accommodate work number 63 as up to date diversionary design studies have not been undertaken. Schedule 5 'Land in Which Only New Rights etc May be Acquired' as currently derefted includes the following powers to acquire rights "Paguired for	These works are provided for in the Schedule of Authorised Development (Schedule 1) of the draft DCO (APP-020). National Highways is content that there is sufficient land and understand from meeting with Cadent that Cadent is content with the extent of the Order Limits. Discussions will continue with Cadent to agree how the rights listed in Schedule 5 of the draft DCO (APP -020) applicable to work numbers 62 and 63 need to be updated if at all. The protective provisions in the draft DCO (APP- 020) provide for the granting of the necessary land rights to Cadent's reasonable satisfaction prior to the decommissioning of existing apparatus.	
	drafted includes the following powers to acquire rights "Required for maintenance and access to utilities". Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It's important that sufficient rights for Cadent are included within the Order to minimise construction delays and to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. This has been raised with National Highways prior to the submission of their application and it is accepted that		



Response reference	Representation Issue	National Highways Response	Also Applies to
	Cadent will not decommission existing apparatus and/or commission new apparatus until sufficient land rights are in place (to its satisfaction) whether pursuant to the DCO or otherwise. National Highways will be responsible for obtaining any land rights outside of the DCO powers. The land rights that Cadent will require are set out at Appendix 2.		
RR-0110-4	Cadent wishes to reserve the right to make further representations as part of the examination process but in the meantime will seek to engage with the promoter with a view to reaching a satisfactory agreement.		



RR-0691 National Grid Electricity Transmission plc.

Response reference	Representation Issue	National Highways Response	Also Applies to:
RR-0691-1	"Dear Sir/Madam REPRESENTATION BY NATIONAL GRID ELECTRICITY TRANSMISSION PLC ("NGET") TO THE A57 Link Roads (previously known as Trans Pennine Upgrade Programme) DCO ("THE PROJECT") NGET wishes to make a relevant representation to the Project DCO in order to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order limits. NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.	National Grid's agreed template protective provisions are included in the draft DCO and National Highways is liaising with National Grid to finalise agreement on these and any further agreement required.	
	The documentation and plans submitted for the above proposed scheme are being reviewed in relation to impacts on NGET's existing apparatus and land interests located within this area, and NGET may require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET will liaise with the Promoter in this regard. NGET assets which have been identified as being within or within close proximity to the proposed Order limits are: OVER HEAD LINE ZZC Route 400kV - BREDBURY - STALYBRIDGE – Tower ZZC014. As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. NGET reserves the right to make further representations as part of the examination process but in the meantime will negotiate with the promoter with a view to reaching a satisfactory agreement. 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."		

Part 5 – Landowners



RR-0173 CS, JJ & WE Bower on behalf of CS, JJ & WE Bower

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0173	"We have serious concerns about the impact of the scheme on our business from a viability point of view. There are implications for the running and practicality of the business from a severance point of view. We have serious reservations about the new access provisions for the business which have not been discussed in any detail with us. They were discussed in outline nearly twelve months ago but nobody has had the courtesy since to refer the detail to us: these plans are the first that we have seen with the new access proposals and are not detailed enough for us to make any meaningful decisions. We feel very strongly that far too much land is being taken for the wrong purpose, and that the overall scheme does not address the underlying issues in the area."	There have been a number of meetings held with C Bower & Sons Ltd over a period of time dating back to consultations in 2018. The last meeting prior to submission of the application took place on 20 November 2020 and, where possible, the requirements discussed have been incorporated into the design published with the draft DCO. We appreciate that there is severance due to the scheme but have ensured access is maintained via a new track off Carrhouse Lane We have also discussed the weight and size restrictions that are required to maintain the farming operations and have therefore included a new access off the proposed A57 link road, solely for farm access. The issue of land take has been discussed several times at length and the current scheme has reduced the impact on the C Bower & Sons Ltd land significantly since 2018 and more recently since the meeting in 2020. National Highways last met with the land owner on 17 November 2021 and further meetings with the land owner and their representatives are scheduled.	



RR-0174 CS, JJ & WE Bower on behalf of C Bower & Sons Ltd

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0174	"As a director of C Bower & Sons Ltd I am concerned about severance of land from the remainder of its landholdings and, more particularly, how the severed land will be accessed for continuing agricultural purposes. We have been given no precise details about the current proposals so have been left with no alternative other than to follow this procedure. There are also concerns about the area of land being taken for the proposed scheme."	There have been a number of meetings held with C Bower & Sons Ltd over a period of time dating back to consultations in 2018, at which the scheme has been discussed and tailored to address the issues raised. We appreciate that there is severance due to the scheme but have ensured access is maintained via a new track off Carrhouse Lane. We have also discussed the weight and size restrictions that are required to maintain the farming operations and have also included a new access off the proposed A57 link road between Mottram Moor Junction and Woolley Bridge Junction solely for farm access.	
		The issue of land take has been discussed several times at length and the current scheme has reduced the impact on the C Bower & Sons Ltd land significantly since 2018.	
		National Highways last met with the land owner on 17 November 2021 and further meetings with the land owner and their representatives are scheduled.	



RR-0434 John J. Bower

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0434	"I am registering my objection to the proposed scheme, on the basis that what is proposed will not achieve any beneficial results. This directly affects me as a landowner."	Section 5 of the Case for the Scheme [APP-182], Economic Case overview, outlines the Economic Case for the Scheme and demonstrates its compliance to the NPS NN objective that strategic highway improvements benefit the economy. Section 5 assesses and monetises anticipated economic, environmental and social benefits of the Scheme based on a 60-year appraisal period, in accordance with DfT guidelines. This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.45. The economic/business Case has been scrutinised and approved by DfT. Section 10 of the Transport Assessment Report [APP-185] sets out the performance of the Scheme against the scheme objectives including connectivity and concludes the Scheme would provide time saving benefits and relieve congestion through Mottram, Hattersley and Woolley Bridge, improving journey times for trips on the Strategic Road Network between Manchester and Sheffield, as well as for trips using the local road network in this area. The Scheme would also relieve congestion on the de-trunked section of the A57, improving connectivity for local traffic. Furthermore, all new and improved junctions will be provided with upgraded Walkers, Cyclists and Horse riders (WCH) facilities (M67 Junction 4, Mottram Moor, Gun Inn Junction and Woolley Bridge) making crossing easier and improving safety.	



RR-0308 Graham Beaumont

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0308	"I feel that the land taken from me [redacted] will be excessive, And I do not wish to sell anymore land than that is needed for the link road to sit on only. I can understand that some land may be used during the build, but once the road is finished I want to retain all the remaining land on both sides of the road. I require this for my rescue animals such as two rescue dogs that i can not walk out in the park as they are reactive, so i need the land so they have a place to work of energy. Plus I need the land for grazing for the pony's. We have had pony's on the land as long as we have owned it."	National Highways will engage in discussions with Mr Beaumont, the landowner of Plots 4/12a, 4/12b, 4/12c, 4/12d, 4/14a, 4/14b, and 4/18 regarding the extent of permanent land take associated with the Scheme. Should it transpire that any part of the land within the Order Limits is not required, for instance, as a result of the detailed design process, the Applicant would only seek to acquire that part of the land required, and in all events, will seek to minimise the effects on land interests	



RR-0323 Hayley Simpson

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0323	"A lorry ban coupled with sustainable transport measures and technological improvements would bring lasting benefits and avoid the above adverse impacts. But Highways England rejected this option. Far reaching changes since 2015 - the declaration of a climate emergency; the Covid-19 pandemic; and a review of the Treasury's rules to assess the value of roads make scrutiny of this option essential. Although air pollution improves for some areas, for others nitrogen dioxide levels remain above the legal limit e.g. on Market Street in Hollingworth. In one part of Dinting Vale air pollution gets worse. The Air Quality Management Areas in Tintwistle and Glossop would remain. The Greater Manchester Clean Air Zone has been excluded from the air quality modelling but could lead to traffic diverting to avoid paying the toll, creating congestion and air pollution elsewhere. THIS POINTLESS ROAD IS TAKING MY BEAUTIFUL GRANS HOUSE ALONG WITH OUR AMAZING GREENBELT!! You want to take a day in my shoes and see how much of an impact this has had on my family! Maybe a day in my life and you would reconsider this whole project! This has made people ill! How would you feel if this was your family? Not knowing if day to day you can enjoy your life!! YOU ALL SHOULD BE ASHAMED OF YOURSELVES!!!"	The inclusion of this property within the boundary of the scheme has been the subject of many discussions between the family and National Highways. The property is currently blighted by the scheme and although not directly on the line of the Scheme due to the property's proximity it is required to enable the construction of the Mottram underpass. Discussions are ongoing and have taken place approximately every two months to provide updates on the scheme and its impact. National Highways has confirmed to the family that it is reviewing information from site investigations and has indicated to the family that it is exploring options to potentially retain the property if it is safe to do so. This is regularly communicated to the family and an explanation as to the current status is provided. In relation to green belt, please see National Highways response to the Relevant Representations made by CPRE Peak District and South Yorkshire in relation to the other issues raised (RR-0170).	



RR-0383 Jason Farrow

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0383-1	"Ref: TR010034 We do not object to the principle of the A57 Link Roads however we have a number of objections to the proposals. We engaged through the consultation process and our client submitted a consultation response but we have not received a response. We requested a meeting to discuss the scheme but no meeting has been forthcoming. Our objections are as follows: Excessive land take	Communications have been received from the agents acting on behalf of the estate to register their interest in discussing the scheme and the potential procurement options of the land, they have also highlighted the impacts on their long-term tenant on the land, who National Highways has been in regular contact to discuss the scheme and its impacts, as well as securing access to undertake surveys in the area.	
		National Highways is scheduled to arrange a meeting in November to understand their concerns	



RR-0604 Michaela Bromley

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0604	"Road accidents would increase (102 more collisions over 60 years) across the network. However on the A57 Snake Pass, a high risk road for a fatal or serious injury crash, there would be 160 extra collisions over 60 years. Over 60 years of operation the scheme would add an extra 399,867 tonnes of carbon dioxide. Over a lifetime of 100 years, one tree absorbs around 1 tonne of carbon dioxide but we cannot wait for nearly 400,000 trees to grow for a hundred years. Carbon emissions must be tested against international and national legislation and guidance including the Paris Agreement, the 2008 Climate Change Act's legally binding target of net-zero carbon emissions by 2050, the UK Sixth Carbon Budget, science-based carbon budgets from the Tyndall Centre, and the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'. I OBJECT AGAINST THIS AWFUL ROAD YOUR TAKING MY MOTHERS HOME/MY FAMILY HOME"	Please see National Highways response to the Relevant Representations made by Derbyshire County Council in relation to road safety (RR-0240-6) and CPRE Peak District and South Yorkshire in relation to carbon emissions (RR-0170). The inclusion of this property within the boundary of the scheme has been the subject of many discussions between the family and National Highways. The property is currently blighted by the scheme and although not directly on the line of the Scheme due to the property's proximity it is required to enable the construction of the Mottram underpass. Discussions are ongoing and have taken place approximately every two months to provide updates on the scheme and its impact. National Highways has confirmed to the family that it is reviewing information from site investigations and has indicated to the family that it is exploring options to potentially retain the property if it is safe to do so. This is regularly communicated to the family and an explanation as to the current status is provided.	



RR-0794 Savills on behalf of Trustees of Mrs E Bissill's Marriage Settlement

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0794-1	"Ref: TR010034 We do not object to the principle of the A57 Link Roads however we have a number of objections to the proposals. We engaged through the consultation process and our client submitted a consultation response but we have not received a response. We requested a meeting to discuss the scheme but no meeting has been forthcoming. Our objections are as follows: Excessive land take	Communications have been received from the agents acting on behalf of the estate to register their interest in discussing the scheme and the potential procurement options of the land, they have also highlighted the impacts on their long-term tenant on the land, who National Highways has been in regular contact to discuss the scheme and its impacts, as well as securing access to undertake surveys in the area.	
		National Highways met with Savills on 23 November 2021 to understand the interested party's concerns and to explain the application.	
RR-0794-2	We have not been provided with clarity on the extent of land to be permanently acquired and request that Highways England demonstrate the need for the permanent land take, specifically the landscaping/planting areas.	The permanent land take is shown on the Land Plans (APP-007) Sheet 1,2 & 7 of 10 highlighted in pink. The description of the land and area is listed in the Book of Reference (APP-025) also submitted as part of the DCO application.	
		Plots listed as permanent land take for your client include:	
		Plots 1/9d approximately 28,744 square metres of agricultural land and public footpath on the north side of highway known as A57, Hyde Road.	
		Plot 2/1b All interests and rights in land comprising approximately 24803 square metres of agricultural land and public footpath on the south side of Edge Lane, Mottram.	
		Plot 2/1f - All interests and rights in land comprising approximately 29208 square metres of agricultural land and public footpath on the west side of Roe Cross Road, Mottram.	
		Plot 2/1k - All interests and rights in land comprising approximately 21 square metres of verge on the west side of highway known as Roe Cross Road, Mottram.	
		Plot 7/1b - All interests and rights in land comprising approximately 11 square metres of agricultural land on north side of highway known as Hyde Road, A57, Mottram.	
		Ecological and landscaping planting areas are presented on Figure 2.4 - Environmental Masterplan in the ES (APP-074).	
		Details of the purpose for which compulsory acquisition is sought for each of the above referenced plots appears at Annex A of the Statement of Reasons (APP-023).	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0794-3	A large area of the land below the new road will be used for temporary compound purposes. We require detail of the proposed access and use of this compound.	Access to the compound area for traffic approaching from the west will be initially from the layby just east of the roundabout with the plan to build an access direct from the roundabout. Traffic from the east would use the same access and use the roundabout to turn around to ensure they used the left in only access. A site access to the new road would be formed to the north of the compound area for all site plant and materials working to the west of the new underpass.	
		The compound will be used for the following:	
		Car parking for staff and site workers	
		Temporary office for staff	
		 Welfare provision for the site workers which will consist of changing rooms/drying rooms and a small canteen 	
		Stores building and compound for storage of small items of equipment	
		 Compound area from traffic management vehicles and equipment (cones and signs) 	
		The compound will not be used for crushing of stone or any other processing of excavated material.	
RR-0794-4	 We note that an attenuation pond and watercourse are to be created, and rights of way diverted. Confirmation of the future ownership of these areas is required. 	An attenuation pond is proposed to the east of the M67 J4 roundabout on plot 1/9d this land is marked as land to be acquired permanently by National Highways on Land Plans (APP-007). The attenuation pond will be owned and maintained by National Highways.	
		On completion of the Scheme the ownership of the right of way lies with the owner of the land on which the right of way sits.	
RR-0794-5	• Land Plan - 2 of 10 shows (2/1i, 2/1g, 2/1a, 1/9a & 1/9b) areas of temporary land take with permanent rights acquired. We request details of the permanent rights together with the justification for these rights. Excessive	All land rights and purpose for which rights over land may be acquired are listed in the draft DCO (APP- 020) and also appear at Annex A of the Statement of Reasons (APP-023).	
	rights being acquired	The plots where rights are to be acquired are:	
		Plot 2/1i is required for access to culvert for structural inspections and maintenance, and the establishment of environmental mitigation and enhancement.	
		Plot 2/1g is required to create access and egress points serving land situated south of Edge Lane, access to culvert for structural inspections and maintenance, and the establishment of environmental mitigation and enhancement.	
		Plot 2/1a is required for maintenance and access to existing water distribution main.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Plot 1/9a is required for access to culvert for structural inspections and maintenance.	
		Plot 1/9b is required for maintenance and access to existing water distribution main.	
RR-0794-6	• A right of way is reserved for maintaining ecology mitigation. The route shown is not an acceptable route for this purpose. We require clarity on the proposed right of way and why it is necessary in that location.	The right of access shown on the Streets and Rights of Way Plans (APP-009), sheet 2, between the points marked 2/10 and 2/11 is intended to provide rights to access and maintain the bat boxes shown as multiple work numbers 50, on the Works Plans (APP-008), also sheet 2. The right of access is required to for inspections and maintenance of ecological mitigation measures which include the installation of artificial bat boxes. As indicated on Sheet 2 of the Scheme Layout Plans (APP-011), sheet 2, this is only intended to provide a right of access and will not be physically defined.	
RR-0794-7	 We request that Highways England demonstrate the need for the diverted and excessive rights of way which will have a detrimental impact on the farming of the land. Farming /business impact We require more information regarding the proposed fencing, drainage, farm access and underpass to assess the impact on the land and farming business. 	National Highways is engaging with the landowners on these matters.	
RR-0794-8	 We note that the width of the underpass is stated to be 3.5m wide, there are no height measurements. We require a full specification of the underpass proposed. 	The height of the underpass is shown on the Engineering Drawings and Sections Plans (APP-012).	
RR-0794-9	We require confirmation that a legal unrestricted right of access will be provided for the use of the underpass.	The proposed Old Mill Farm Underpass will provide access for agricultural purposes to the areas of the farm which might otherwise be severed by the Scheme. In addition, as part of our commitment to promote active travel, the underpass will be used to provide walking, cycling and horse riding access via the proposed bridleway which reconnects the severed footways which currently link the A57 to Edge Lane.	
RR-0794-10	 Field drainage is not shown on the culvert and drainage drawings. We require confirmation that a field drainage scheme will be designed and implemented by a specialist agricultural drainage contractor. 	Existing field drainage outside of the Scheme will remain unchanged. Where existing field drainage is severed by the construction of the Scheme, these drains will be connected into the proposed highway drainage system in accordance with National Highways standards.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0794-11	There are currently four culverted crossing points over the Hurstclough Brook. We require confirmation that these access points will remain	The permanent scheme boundary runs along the northern bank of Hurstclough Brook from Hattersley Roundabout for a distance of approximately 400m. After this point the brook is diverted under the proposed link road via a proposed channel and culvert. This culvert reconnects to the existing Hurstclough Brook to the north of the link road. At the point where Hurstclough Brook connects to the diverted channel a field access crossing will be provided. This provides access to the farmland to the north of the link road via the proposed bridleway and underpass. Other than the section of Hurstclough Brook which is severed by the construction of the Scheme, existing culverts on Hurstclough Brook will remain unchanged.	
RR-0794-12	 Residential property Old Mill Farmhouse is situated approximately 185m from the new road. The farmhouse is in very close proximity and there will be a significantly detrimental impact on the residential amenity. 	See responses RR-794-13 and 14 below for details of where Old Mill Farmhouse has been considered as a receptor within the Environmental Statement.	
RR-0794-13	We have not received any details relating to the proposed mitigation measures in respect of noise, light and vibration.	Proposed mitigation measures in relation to Noise and Vibration, include noise barriers and the cutting west of the Mottram underpass, which would help to reduce noise levels. These are outlined in Section 11.8 of Chapter 11: Noise and Vibration of the ES (APP-067). In addition, typical cross sections through this section of the Link Road including details of the proposed mitigation measures are shown in 2.7 Engineering Drawings and Sections Plans (APP-012) The lighting design will seek to minimise obtrusive light pollution. Lighting will only be on the approach to the western portal of the Underpass, and not the full length of this section of the Link Road. No lighting is proposed on the vegetated area on the top of Mottram Underpass. Proposed mitigation measures in relation to light are outlined in Section 7.8 of Chapter 7: Landscape and Visual Effects of the ES (APP-063). Environmental mitigation measure incorporated into the Scheme's design in the form of embedded mitigation measures for lighting and noise and vibration are also outlined in Table 2-5 of Chapter 2: The Scheme in the ES (APP-060). Furthermore, the overall lighting strategy for the relevant section of the Link Road alignment is provided in sections 2.5.22 and 2.5.23 of Chapter 2.	RR-0818



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0794-14	We request a copy of the EIA which covers noise, light and vibration impacts. We require details of mitigation measures proposed for noise, light and vibration. We are willing to discuss the above matters with Highways England with a view to seeking a satisfactory conclusion for both parties, but until such time as a satisfactory conclusion is reached, this objection remains extant."	Potential impacts of the Scheme are presented in the Environmental Statement documents. For noise and vibration, dwellings along Edge Lane (including Old Mill Farmhouse) would experience a minor magnitude of impact due to the construction of Old Mill Farm underpass. During the operational phase, these properties have been identified as having a Significant adverse effect due to the Scheme. No significant vibration effects are predicted. Although mitigation measure have been incorporated into the design (see R-906-13 above) noise increases are predicted even with these in place, meaning a significant residual effect would still occur. Further details of potential Noise and Vibration impacts are outlined in Chapter 11: Noise and Vibration of the ES (APP-067). For lighting effects, during the operation phase receptors along Edge Lane (including Old Mill Farmhouse) will experience lighting as a noticeable new	RR-0818



RR-0792 Savills (UK) Ltd on behalf of Crossways Commercial Estates Ltd

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0792-1	"Dear Sir/ Madam, I write on behalf of Crossways Commercial Estates Ltd the freehold owners of part of the land affected by the A57 upgrade – land registry reference GM917343. The site comprises the eastern edge of the proposed link road. We support the principle of the A57 bypass, albeit have comments in respect of route alignment in the interests of avoiding sterilising land with development potential. These points have been outlined in our representations to Highways England dated 15th December 2020. The main points of which were as follows: - Support in principle - The need to move the signalised junction southwards at its Woolley Bridge tie in as per 2018 designs The need to move the River Etherow crossing further southwards as per 2018 designs. We wish to register our interest and maintain close engagement with the DCO process. Kind Regards, Rob Moore MRICS MRTPI"	National Highways can confirm that the centre line of the proposed Woolley Bridge junction has not changed in comparison with the design presented at the 2018 consultation. However, in developing design of the junction an additional right turn lane has been added from the link road to the southbound A57. After reviewing the forecast traffic flows this lane was required to avoid traffic building up on the new link road and improve the operation of the traffic signals. The addition of the right turn lane has however moved the proposed permanent land boundary to the north of the junction of the junction approximately 3m further to the north in comparison with the proposals presented in 2018. This change is localised to the Woolley Bridge junction over the extent of the additional lane. However, if the junction centre line was to be moved to the south, the overall link road alignment would be impacted over a much greater extent. The additional turning lane does not extend over the River Etherow crossing and the position and width of this structure has not changed in comparison with the scheme presented during the 2018 consultation.	



RR-0793 Savills (UK) Ltd on behalf of Mr D Radford

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0793-1	"Dear Sir/ Madam, I write on behalf of Mr. D Radford the freehold owners of part of the land affected by the A57 upgrade – land registry reference GM306567. The site comprises part of the central area of the proposed link road and abuts Carrhouse Lane. We support the principle of the A57 bypass, albeit have comments in respect of route alignment in the interests of avoiding sterilising land with development potential. The main points of which were as follows: - Support in principle - The need to move the road alignment southwards to avoid the potential development site The need to move the attenuation areas southwards to the east of the site outside my client's land. We wish to register our interest and maintain close engagement with the DCO process. Kind Regards, Rob Moore MRICS MRTPI"	In response to the need to move the road alignment southwards to avoid the potential development site, the proposed diversion to Carrhouse Lane accommodates a public right of way connection between north and south of the proposed link road and, as such, is required to accommodate the needs of all users through compliance with the Department for Transport (DfT) Inclusive Mobility standard with respect to the gradients used. These constraints, combined with the requirement to minimise the link road height, in order to lessen the overall visual impact of the Scheme, and the need for a suitable junction layout with adequate turning and visibility provision at the proposed junction with Carrhouse Lane, have resulted in the design currently presented. We also note that plot reference 9/9a, as shown on the Land Plans (APP-007), will be acquired on a temporary basis for the construction of a proposed land drain, following which this plot will be returned to the landowner. We are continuing to refine the design within the limits of deviation in the draft DCO application and we would be willing to discuss these issues further. With regards to the need to move the attenuation areas southwards, we are not aware of a proposed attenuation feature within land registry reference GM306567. However, we acknowledge the temporary possession and acquisition of rights and the temporary possession for plots 4/22a and 4/22b respectively. These are required for the installation of a proposed United Utilities water main diversion and connection to the existing United Utilities water main diversion and connection of the works, as will plot 4/22b will be returned to the landowner on completion of the works, as will plot 4/22a albeit with additional access rights for United Utilities to enable the maintenance of the proposed water main diversion, these rights are expected to be similar to those already in place within land registry reference GM306567.	

Part 6 – Other interest & amenity group



RR-0106 British Mountaineering Council

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0106-1	"The British Mountaineering Council is the national representative body for climbers, mountaineers and hill walkers in England and Wales. From our perspective the main issues we consider the Inspector should examine relate to 1. The impact the Link Road will clearly have on the A57, the A628, and	Please refer to National Highways' response to the Relevant Representation from the Peak District National Park Authority (RR-0677).	
	recreation in the Peak District National Park. The wider impact of the proposed Link Road must be every bit as relevant to its planning as the infrastructure of the road itself. Statutory purposes for which National Parks were created in this country include the landscape, biodiversity, conservation and enjoyment of the special qualities of those areas which were so dedicated, for National benefit.		
RR-0106-2	2. The title of the project – A57 Link Road – suggests part at least of the concept of the new road will be to facilitate traffic flows, and inevitably see an increase, onto the A 57 Snake Pass. This is already a high risk road for fatal and serious injury crashes. Increasing traffic flow on such a road would seem, self evidently, ill advised.	Please refer to National Highways' response to the Relevant Representation from the Derbyshire County Council (RR-0240-6).	
RR-0106-3	3. Furthermore, we believe increasing traffic on a trunk road through a National Park to be contrary to National Policy.	Please refer to National Highways' response to the Relevant Representation from the Transport Action Network (RR-0880-5).	
RR-0106-4	4. A foreseeable corollary will be demand for significant new engineering works on both this road, and on the A628, where these pass through the National Park, to the detriment of its conservation, and quiet enjoyment of its special qualities.	National Highways' response is based on the assumption that the road being referred to here is the A57 Snake Pass and the A628 within the Peak District National Park (PDNP). No part of the Scheme is being undertaken within the PDNP.	
		Please refer to National Highways' response to the Relevant Representation from the Peak District National Park Authority (RR-0677).	
RR-0106-5	5. Many established walking routes, and not just the National routes like the Pennine Way, cross areas of Peak Moorland north to south. Crossing the A57 and A628 is already hazardous with existing traffic flows.	Please refer to National Highways' response to the Relevant Representation from the Peak District National Park Authority (RR-0677-11).	
RR-0106-6	6. Additionally safe parking for vehicles is prohibitively difficult, a contributory factor to road safety issues and a cause of local nuisance.	The Scheme lies outside the Peak District National Park boundary and so it is beyond the scope of the Scheme to address pre-existing issues related to current levels of parking provision within the PDNP. This is a matter for the Peak District National Park Authority and Derbyshire County Council to address.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0106-7	7. These aspects, let alone the impact on wildlife, do not, on our reading, receive anything like adequate coverage in the proposals. They must surely be integral to it: the Link Road is not just a stand alone development. It can not responsibly be considered in disregard of its wider impact on people, and indeed to wildlife. Even now roadkill is significant.	The impact of the Scheme on biodiversity has been assessed and the findings are set out in Chapter 8 Biodiversity of the Environmental Statement [APP-064]. This identifies embedded mitigation measures which have been incorporated into the Scheme design to avoid and prevent effects including environmental working practices to ensure adequate pollution control measures are implemented and use of precautionary methods of working (PMW) during construction to minimise risks to individual animals of protected species where licences would not be required. It notes that the Scheme would result in an increase in notable habitats in	RR-0058 RR-0112 RR-0133 RR-0167-1 RR-0203 RR-0206 RR-0211 RR-0334 RR-0478 RR-0579 RR-0620 RR-0697 RR-0713 RR-0722 RR-0750 RR-0818 RR-0860 RR-0870
		terms of area and quality to ensure that sufficient and increased habitat is provided across the Scheme. Essential mitigation has been provided for protected species through increased breeding opportunities (including a dedicated bat structure and a range of bat/bird nesting boxes) a several crossing points to aid connectivity across the Scheme. Mitigation measures under licence (for bats and badgers) will be required due the legal protection afforded to these species.	
		The assessment concludes that no significant adverse residual effects have been predicated as a result of the Scheme.	
		The impact on population and human health is assessed in ES Chapter 12 - Population and Human Health [APP-068]. It sets out that the Scheme has been designed, as far as possible, to avoid and minimise impacts and effects on population and human health through the process of design-development considering good design principles. Embedded mitigation is reported as part of the scheme description in Chapter 2 of the ES [APP-060].	
RR-0106-8	8. Outdoor recreation and access to specially protected landscapes is directly relevant to the health of the community. It is as important nationally as ease of the passage of road traffic. The application to us would seem to be seriously lacking in any consideration of this essential element, and as it stands appears to have been conceived from an exclusively narrow perspective.	It is acknowledged that there is potential for the Scheme to have temporary adverse effects on transport options during construction. A Negative Health Outcome is reported owing to severance issues that may occur due to disruptions to existing road usage and increases in the amount of construction traffic. It is however important to stress that these effects are temporary and limited to the construction phase.	RR-0461 RR-0677
		During operation, the provision of improvements on the existing A57(T) and A57 with the possible inclusion of cycle lanes, improved pedestrian and cyclist crossing facilities at the M67 junction 4, and all new junctions created by the scheme, upgrading of the PRoW LON 52-20 from a footpath to a bridleway, increasing the availability of suitable equestrian facilities away from road traffic and creation of a combined footway and cycleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans-Pennine Trail (National Cycle Network route 62) are associated with a Positive Health Outcome and Moderate Beneficial effects for walkers cyclists and horse riders, which is significant.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		In respect of social cohesion, during operation the Scheme would reduce community severance through the separation of local and regional traffic resulting in large reductions of traffic on the existing A57. This presents the opportunity to make this stretch of road much more friendly to cyclists and pedestrians (across all groups) through improved facilities and crossings, public realm improvements and reduction in speed. This is anticipated to lead to positive benefits to health and wellbeing and is therefore associated with a Positive Health Outcome. Traffic congestion issues will be alleviated with significant reductions in traffic predicted at Mottram Moor (between Back Moor and Stalybridge Road, Hyde Road and Woolley Lane), therefore providing a safer and more pedestrian friendly environment in the village. The scheme makes considerable provisions for walkers, cyclists and horse riders (WCH), improving connectivity and the new bypass will also provide for more reliable, shorter journey times.	
		With respect to landscape amenity, the Scheme has been designed to avoid or reduce, as far as practicable, the adverse effects. Landscape and visual essential mitigation measures, which form an integral part of the Scheme, include native woodland, shrub planting, and linear planting, roadside specimen trees, grassland meadows and amenity grassland and verges. The Scheme also includes some use of cuttings, false cuttings and embankments. By the design year (Year 15) there are no effects on the Landscape and Townscape Character considered to be significant.	
		At opening year, 13 of the 19 representative viewpoints would continue to undergo significant adverse effects. By design year (15 years after opening), only three of these would continue to experience significant effects. These would have the potential to cause adverse effects on wellbeing for wider groups through ongoing loss of visual amenity. No differential effects on vulnerable groups have been identified.	
		In addition, 48 individual or groups of visual receptors reported in the ES Appendix 7.1, Visual Effects Schedule [APP-166] would experience significant effects at the opening year. By design year (15 years after opening) only twelve receptors would continue to experience significant effects. These would have the potential to cause adverse effects on wellbeing for wider groups through ongoing loss of visual amenity. No differential effects on vulnerable groups have been identified.	
		There would be a traffic change through the Peak District National Park as a result of the Scheme, however, these changes vary depending on the route and the time of day. It is not considered that there would be any significant indirect effects to the visual amenity within the Peak District National Park due to these traffic changes.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		However, Chapter 12 - Population and Human Health [APP-068] anticipates a negative health outcome with respect to Landscape and visual effects during operation owing to the potential for adverse effects on wellbeing through loss of visual amenity.	
RR-0106-9	9. Though outside our particular area of expertise we would also voice a general concern that increasing traffic flows, as predicted, will generate more carbon emissions, which would be contrary to National policies on their reduction.	Please refer to National Highways' response to the Relevant Representation from Transport Action Network (RR-0880-1).	
RR-0106-10	10. It would seem counter intuitive that the way to alleviate an acknowledged traffic flow problem is confined to a hugely expensive investment which can only increase that traffic flow, to the detriment of a valued National asset, and its enjoyment."	Chapter 5 of the Case for the Scheme (APP-182) sets out the approach to assessing the economic benefits of the Scheme. In particular Table 5-7 provides an analysis of Monetised Costs and Benefits. After inclusion of the benefits associated with journey time reliability and wider economic impacts the 'Adjusted Benefit Cost Ratio' is shown to be 2.45.	



RR-0113 Campaign for National Parks

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0113-1	"We object to TRO10034 for the following reasons: 1. Increasing road capacity is not the solution. There is evidence that road schemes justified on the basis of reduced journey times fail to deliver the promised economic benefits and road-building is particularly damaging in areas in or close to National Parks where the economy is heavily dependent on a high quality environment.	Section 5 of the Case for the Scheme (APP-182), Economic Case overview, outlines the Economic Case for the Scheme and demonstrates its compliance to the NPS NN objective that strategic highway improvements benefit the economy. Section 5 assesses and monetises anticipated economic, environmental and social benefits of the Scheme based on a 60-year appraisal period, in accordance with DfT guidelines. This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.45. The economic/business Case has been scrutinised and approved by the DfT. The Scheme is not within the National Park, however indirect landscape and visual effects on the National Park have been considered as part of the Environmental Statement (ES). Chapter 7: Landscape and Visual Effects of the ES (APP-063) concludes that whilst there would be a traffic change through the Peak District National Park as a result of the Scheme, these changes vary depending on the route and the time of day, and it is not considered that there would be any significant indirect effects to the landscape character or visual amenity within the Peak District National Park. Accordingly no economic disbenefits are anticipated in areas dependent on the Peak District's environment.	RR-0058, RR-0096, RR-0106, RR-0112, RR-0133, RR-0182, RR-0203, RR-0206, RR-0211, RR-0334, RR-0478, RR-0516-5, RR-0562, RR-0606, RR-0697, RR-0713, RR-0722, RR-0750, RR-0795, RR-0818, RR-0860
RR-0113-2	2. Full consideration should be given to adopting alternative solutions to the traffic and congestion problems in this area before any consent is given to road-building. For example a National Park-wide weight restriction in conjunction with sustainable transport measures and technological improvements would bring lasting benefits and avoid the adverse impacts below.	Please see National Highways' response to the Relevant representation made by the National Trust in respect of weight restrictions (RR-0620- 6).	
RR-0113-3	3. The Covid-19 pandemic has had a significant impact on our working and travelling patterns and the focus should now be on developing future travel options which encourage people to use alternatives to the car. The scheme is completely incompatible with the urgent need to tackle the climate emergency and the UK's international and national commitments to reduce carbon emissions including the Paris agreement, the 2008 Climate Change Act, the legally binding target of net-zero carbon emissions by 2050, the UK Sixth Carbon Budget, and the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'. Over 60 years the scheme would add an extra 399,867tCO2e.	Please see National Highways' response to the Relevant representation made by Derbyshire County Council in respect of the impact of Covid-19 on traffic forecasts (RR-0240-23). Please see National Highways' response to the Relevant representation made by Peak District National Park Authority in respect of the carbon assessment (RR-0677-13).	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0113-4	4. The scheme would damage the special qualities of the Peak District National Park and is incompatible with the statutory purposes of National Parks which are our finest landscapes with the highest level of protection. There is a long-established presumption against significant road widening or the building of new roads in National Parks "unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly" (paragraph 5.152 of the National Policy Statement for National Networks).	Please see National Highways' response to the Relevant representation made by Peak District National Park Authority (RR-0677). As stated above, indirect landscape and visual effects on the National Park have been considered as part of the Environmental Statement (ES). Chapter 7: Landscape and Visual Effects of the ES (APP-063) concludes that whilst there would be a traffic change through the Peak District National Park as a result of the Scheme, these changes vary depending on the route and the time of day, and it is not considered that there would be any significant indirect effects to the landscape character or visual amenity within the Peak District National Park. Please see National Highways' response to the Relevant representation made by the Transport Action Network in respect of National Park policy (RR-0880-5). Please see National Highways' response to the Relevant representation made by the Campaign for National Parks (RR-0113-1) regarding impacts on landscape and cost benefit ratio of the Scheme.	RR-0735, RR-0880
RR-0113-5	5. It would also damage areas of local countryside which are highly valued for their natural undeveloped character, open views, tranquillity and recreational opportunities.	With regards to landscape character and tranquillity: Following a meeting with PDNPA (26 January 2021) a draft indirect assessment methodology was provided to the PDNPA (19 February 2021). Comments received were considered and tranquillity and wildness were consequently included, where relevant, in the assessment. Indirect effects upon the PDNP resulting from increased traffic were assessed. Perceptual/experiential effects were included within the methodology. Chapter 7 Landscape and Visual Effects of the ES (APP-063) Paragraphs 7.3.39 and 7.3.40 of the ES considered the Special Qualities of the PDNP including tranquillity and wildness). Chapter 7 Landscape and Visual Effects of the ES (APP-063) Table 7.29 Indirect Effects recognised that traffic numbers would increase for the A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased or decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity), was not high enough to result in a significant effect greater than slight adverse. This was because the existing traffic detracts from tranquillity and quiet so that the proposed change in traffic was not dissimilar to that experienced in the baseline.	RR-0048, RR-0113, RR-0169, RR-0356, RR-0620, RR-673, RR-0677, RR-0697, RR-0801, RR-907



Response reference	Representation Issue	National Highways Response	Also Applies to
		With regards to open views: Viewpoints within the PDNP were agreed with the PDNPA. Viewpoints 19-27 inclusive were represented in Chapter 7 Landscape and Visual Effects of the ES (APP-063) Table.7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP and addressed views including open views. For the visual receptors at these viewpoint locations the magnitude of change of increased/decreased traffic, based on the existing scenario did not result in a significant effect for visual receptors within the PDNP. The significance of effect was neutral.	
		With regards to undeveloped character, the key characteristics of the Landscape Character Areas (LCAs) were set out in Table 7.29: Indirect Effects on Landscape Character Areas within the PDNP in Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063). The assessment focused on the Landscape Character Types (LCTs) within which the routes experiencing potential increases were located. These key characteristics included those pertaining to undeveloped character including open moorland, heather moor, wild unsettled landscape, and pastoral landscape, The assessment found that the changes to traffic would not likely to be easily perceptible within the landscape from the baseline condition and the significance of effect was no more than slight adverse.	
RR-0113- 5b	By causing some traffic to divert from the M62, the scheme would result in increased traffic on many residential roads in Longdendale and Glossopdale.	Please see National Highways' response to the Relevant representation made by Derbyshire County Council in respect of re-routing traffic (RR-0240-6)	
RR-0113- 5c	This undermines national policies to encourage walking, cycling and public transport for local journeys. It would also result in increased traffic on trans-Pennine routes through the National Park which is contrary to national policy.	Please see National Highways' response to the Relevant representation made by the Transport Action Network in respect of National Park policy (RR-0880- 5) Please see National Highways' response to the Relevant representation made	
		by the Holme Valley in respect of Modal Shift and NN NPS (RR-0336-1).	
RR-0113-6	6. Furthermore, this increased traffic would lead to increases in collisions, particularly on cross-Park routes such as the A57 Snake Pass which already experience high levels of fatal and serious collisions.	Please see National Highways' response to the Relevant representation made by Derbyshire County Council in respect of road safety (RR-0240-6)	
RR-0113-7	ii)The transport appraisal and modelling must be scrutinised through the examination in order to ensure public confidence in the results.		



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0113-8	the legal acceptance of the new carbon budget and publication of the Transport Decarbonisation Strategy. It must therefore be updated to reflect them."	The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and is based on the DfT's National Trip End Model (NTEM), the latest version of which predates the publication of the Transport Decarbonisation Strategy. Until the DfT updates NTEM to reflect the new carbon budget and publication of the Transport Decarbonisation Strategy, National Highways can only rely on the established method of forecasting traffic growth for the assessment of the Scheme, since no alternative traffic forecasting tool currently exists.	
		The assessment captures the impacts of the Scheme on all legislated Carbon Budgets up to and including the sixth Carbon Budget (2033-37). Please refer to 14.9.10 of the Environment Statement (APP-070).	



RR-0161 Climate Emergency Planning and Policy

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0161-1	"Dr Andrew Boswell, Climate Emergency Planning and Policy As an independent environmental consultant specialising in climate science, policy, and law, I object to the A57 Missing Link scheme: A. Table 14-16 of the Environmental Statement shows the scheme emitting over 100,000tCO2e of additional carbon emissions into the Climate Emergency era.	A. The Chapter 14: Climate of the Environment Statement considers the impact on the ability of the UK Government to meet its legislated targets regarding climate change, including all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965MtCO2e, which was adopted by the Government and was due to pass into law at the time in which the ES was being prepared. Chapter 14: Climate of the ES [APP-070] reported with this policy in view and explained the impact of the Scheme on Government's ability to meet its legislated carbon reduction targets.	
RR-0161-2	B. The absence of cumulative, and short, medium and long-term, impact assessment of carbon emissions renders the Environmental Statement inadequate under the EIA Regs, and subject to EIA Reg 20.	B. UK Carbon Budgets, used to put emissions from the Scheme into context, are inherently cumulative as they consider emissions across all sectors of the economy. Please refer to National Highways' response to the Peak District National Park Authority Relevant Representation (RR-677-13).	
RR-0161-3	C. The applicant's carbon assessment does not reduce operational carbon emissions over the 60-year appraisal period, as required by the government's Transport Decarbonisation Plan (TDP) for ambitious quantifiable carbon reductions in transport at the local level.	C. The CCC's 2019 report 'Net Zero: The UK's contribution to stopping global warming' reassessed the UK's long-term emissions targets and pathways for achieving these, and formed the basis of the Government's Net Zero amendment to the Climate Change Act. The main pathway element recommended by the CCC for transport and transport infrastructure is electrification of the national fleet. This will require a fit-for-purpose road network with adequate capacity. The CCC's 'core' and 'further ambition' scenarios both include an element of modal shift to non-road transport. However, road transport remains the central focus of policy and will continue to require appropriate infrastructure.	
RR-0161-4	D. In the critical 4th carbon budget (2023-2027), an additional 55,253 tCO2e will be emitted, and approximately a further 29,231 tCO2e will be emitted in 2028-2030. These additional emissions fall in the period leading up to the UK international commitment, via its NDC under the Paris Agreement, to reduce emissions by 68% by 2030, creating a serious risk against the UK delivering on its NDC commitment by 2030.	D. Consideration should be given to whether a scheme would materially affect the ability of the Government to meet its carbon reduction targets. The NPS NN clearly states (paragraph 5.18) that this is unlikely for a road improvement scheme, as all projects of this type (in total) amount to less than 0.1% of UK carbon budgets per year. DMRB LA114 also notes this stance in its guidance.	
RR-0161-5	E. No carbon assessment of the scheme has been made against the period 2038-2049 when the UK is required legally to achieve net-zero, but the scheme is modelled to generate an enduring high-level of absolute carbon emissions. Scientists are clear that a net-negative world, with massive extraction of CO2 is required urgently well before 2050. See the recent report from Climate Crisis Advisory Group, chaired by Professor Sir David King, former UK Government's Chief Scientific Advisor commentary of the IPCC 6th	E. It should be noted that the assessment in Chapter 14: Climate of the ES is conservative, insofar as the comparison to UK Carbon Budgets to 2037 is concerned. Given current policy commitments, described below, it is considered to be an overestimate as the uptake of new electric vehicles in future years would be expected to be higher than the proportions used in the national projections included in Defra's Emissions Factor Toolkit (v10) used for the scheme assessment. Within the Emissions Factor Toolkit account is not taken for the increase of electric vehicles beyond 2030.	



Response reference	Representation Issue	National Highways Response	Also Applies to
	Assessment report "The final warning bell" at www.ccag.earth.		
RR-0161-6	F. No assessment of the scheme has been made against the 36-year period 2050-2085, post the UK 2050 net-zero target when the scheme is modelled to emit infinitely greater emissions than the Government and CCC's implied budget for the post net-zero era. The applicant has provided no indication of how these additional carbon emissions would be mitigated. This has a clear material impact on the ability of the UK to contribute to the global endeavour to stabilise global heating at 1.5oC, and it does not comply with the UK obligations under the Paris Agreement.	F. The Net Zero target requires a holistic strategy across all sectors of the economy, and it is acknowledged that some sectors will not be able to eliminate all of their emissions – some residual emissions will need to be remediated in other sectors through enhanced carbon sinks. It is noted in the CCC report that reaching net-zero emissions will require the development or enhancement of shared infrastructure to enable many of the actions which are required. Although infrastructure development will generate some GHG emissions, it is not precluded but encouraged in the right instances by the CCC.	
RR-0161-7	G. CEPP do not accept that only comparing carbon emissions from the scheme against carbon budgets for the entire UK economy is a credible assessment method. It is a deliberate tactic to "loose the signal in the noise", and it is antithetical to good science.	G. See response to A and B.	
RR-0161-8	H. Carbon emissions should be tested locally, regionally and nationally against the UK obligations under the Paris agreement including the UK's Nationally Determined Contribution (NDC), the legally binding target under the Climate Change Act 2008 to meet netzero carbon emissions by 2050, the UK Sixth Carbon Budget (6CB), the revised NPPF 152 planning requirement to "radical reductions of greenhouse gas emissions", the statutory duty on Highways England under the Infrastructure Act 2015 section 5(2) to have regard for the environment, and relevant local authority Environmental Policies."	H. It was held in the very recent case of R (Transport Action Network Limited) v Secretary of State for Transport and Highways England Company Limited (2021) EWHC 2095 (Admin) that in relation to the judgment reached regarding the entirety of the carbon emissions from all schemes within RIS 2 (which includes this scheme, rolled forwards from RIS 1): "I see no reason to question the judgment reached by the DfT that the various measures of carbon emissions from RIS2 were legally insignificant, or de minimis, when related to appropriate comparators for assessing the effect on climate change objectives." (paragraph 159 of the judgment). Since that is the conclusion reached in relation to all schemes within RIS 2, the Scheme is a small part of an overall programme which is de minimis in terms of its impact upon carbon reduction commitments. The NPS NN states that generation of emissions is not in of itself a reason to refuse development consent (paragraph 5.18), particularly when the magnitude of these emissions is small in comparison with the reductions which will be generated by improvements such as electrification of the fleet. Local Carbon Budgets as defined by local or regional bodies are not defined in the relevant National Policy Statement for National Networks, nor in the Climate Change Act or any dependent legislation. These are not therefore considered to have legal force when it comes to examining the suitability of the Scheme for its impact on ability to reduce carbon emissions	



RR-0169 CPRE Lancashire, Liverpool City and Greater Manchester

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0169-1	"Dear Planning Inspectorate, I am writing on behalf of the Campaign to Protect Rural England Lancashire, Liverpool City Region and Greater Manchester (CPRE) with a request to be an Interested Party and to represent at the hearings for the A57 Link Roads. CPRE wants a thriving, beautiful countryside for everyone. Tameside has lovely rural places that should be afforded protection as strategic transport infrastructure is planned. Key CPRE issues: Climate emergency harm, as highlighted by the evidence from the IPCC report in August 2021, requires a radical change to investment decisions.	Chapter 14: Climate of the Environmental Statement (ES) [APP-070] considers the impact of the Scheme on the ability of the UK Government to meet its legislated targets with regards to Climate Change, including all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the Scheme. This includes the sixth Carbon Budget of 965MtCO2e, which was adopted by the Government and was due to pass into law at the time in which the ES was being prepared. The ES Climate Chapter reported with this policy in view and explained the impact of the Scheme on the UK Government's ability to meet its legislated carbon reduction targets. The ES also provides an in-depth assessment, that is in line with the framework set out in IPCC Ar6, Cross Chapter Box 1.3¹, of the effects of the changing climate on the Scheme and presents associated adaptations.	RR-0282-3, RR- 0485-1
RR-0169-2	Air quality harm in the area is poor due to congestion and arising high levels of pollution causing many health problems and high mortality rates. More road building will exacerbate the problem.	It is acknowledged that air quality in the vicinity of the A57 Link Roads Scheme does not currently meet UK Government air quality standards. Local air quality monitoring data (as reported in Chapter 5: Air Quality of the ES [APP-061]) indicates that there are currently exceedances of the annual mean UK Government air quality strategy (AQS) objective for nitrogen dioxide (NO2) in Denton, Hyde, Mottram, Woolley Bridge, Hollingworth and Dinting Vale. There are also exceedances of the hourly mean AQS objective for NO2 adjacent to the A57 in Mottram. Air Quality Management Areas (AQMA) are present within the Scheme footprint (Greater Manchester AQMA) and the wider air quality study area for the scheme assessment (Glossop AQMA). These AQMA have been designated due to the exceedances of UK Government AQS objectives for NO2. However, there are no exceedances of particulate matter AQS objectives in the vicinity of the Scheme.	
		The Scheme will involve the construction of new roads. These new roads would provide a bypass of the existing A57 where air quality is currently above UK Government AQS objectives, moving traffic emissions away from the adjacent residential properties areas and improving air quality in these locations. There would be increases and decreases in air pollutant concentrations on existing roads that are not bypassed as a result of changes to route choice which would lead to changes in traffic volumes and hence changes in emissions. However, the assessment undertaken and reported in Chapter 5: Air quality of the ES [APP-061]) did not identify a significant adverse effect on human health due to the Scheme and overall found the impact of the Scheme on air quality would be an improvement.	

 $^{{\}color{red}^{1}} \ https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf$

Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/EXAM/9.5



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0169-3	Residential amenity harm will be further harmed. More road development and traffic will lead to a decrease in tranquillity with additional noise, vibration and light pollution.	The noise impacts resulting from the operation of the Scheme are shown in Chapter 11 Noise and vibration of the ES [APP-067], with noise contours shown in Figures 11.7 to 11.17 [APP-136 to APP-146]. The road traffic noise impacts at different locations are shown in Table 11.35 of the ES. Overall, there were more sensitive receptors that were predicted significant beneficial effects than significant adverse effect, with dwellings located within Noise Important Area 10992 (such as Hyde Road and Mottram Moor) benefitting the most from the Scheme. The significant adverse effects were mostly located at Four Lanes, Ash Close, Tollemache Road, Tollemache Road, Old Hall Lane, Old Road, Market Street and Woolley Bridge.	RR-0069, RR-0182, RR-0449-4, RR- 0479-3, RR-0512, RR-0649, RR-0818
		The Scheme incorporates several mitigation measures within its design, including permanent noise barriers and low noise road surfacing, to reduce noise levels. The benefits of these mitigation measures are inherent in outcomes of the noise assessment. Further information on the mitigation measures is provided in Section 11.8 of the ES.	
		As stated in 11.3.52 of the ES, operational vibration from road traffic was scoped out of the assessment on the basis that it is linked to road surface discontinuities, such as pot holes therefore vibration impacts are associated with older roads.	
		Tranquillity is defined within Guidelines for Landscape and Visual Impact Assessment (GLVIA) (LI and IEMA 2013) as 'a state of calm and quietude associated with peace, considered to be a significant asset of landscape'. The assessment [APP 063] includes consideration of tranquillity, where relevant, within the Scheme Level Landscape Character Areas (SLLCA) and Scheme Level Townscape Character Areas (SLTCA) as set out in Chapter 7, Table 7.26 [APP-063] and Figure 7.3 (APP-092)	
		As set out in Appendix 7.1 of Chapter 7: Landscape and Visual Effects of the ES [APP-166], Table 1.1, effects on residential receptors during construction are mostly large or very large level of significance. This is due to these receptors being in relatively close proximity to the Scheme and the nature of construction. However, the effect is temporary.	
		Chapter 7 Landscape and Visual Effects of the ES [APP-063] paragraphs 7.9.36 to 7.9.42 set out the residential areas where adverse effect during operation is more likely. This is due, in part, to the opening up of views to the Scheme and traffic upon it mainly resulting from demolition of built form and/or reduction of vegetation coupled with new underbridges and/or junctions. New elements would in some instances include lighting.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		A night-time lighting assessment was undertaken in line with DMRB LA107 requirements. Six representative viewpoints were selected for night-time views. The Scheme's lighting and vehicle headlights would result in night-time effects on views. New effects (beyond the existing highway infrastructure) would be most apparent around areas previously unlit. These were represented by viewpoint 1 and 4 of the M67 Roundabout adjacent to Grange Farm to Roe Cross Road (A6108), adjacent to Hurstclough Brook; a section represented by viewpoint 6 from Old Hall Lane to Mottram Moor Junction; and from Mottram Moor to Woolley Bridge (along the Etherow Valley), represented by viewpoints 8 and 14.	
		Of the six viewpoints above, only one (VP4 Roe Cross Road A6108 and adjacent resident properties Four Lanes) has a residual moderate adverse effect at summer year 15. Whilst lighting has been designed to minimise obtrusive light pollution, views of the route from this location include new lighting situated within previously unlit areas of darkness. As a result, lighting would be a noticeable new feature in the view.	
		The Scheme has been designed to avoid or reduce, as far as practicable, adverse effects. A range of mitigation commitments including planting and noise barriers/fences/walls for screening and/or noise reduction are set out in ES Chapter 7, Table 7.25: Essential mitigation.	
		As a result of the application of essential mitigation measures, only one residential receptor (Roe Cross Road) listed in Table 1.2 of Environmental Statement Appendix 7.1 (APP-166) was assessed to have to have a moderate adverse effect in the summer of year 15.	
		As a result of the application of essential mitigation measure, of the 53 residential properties (individual or clusters) listed in Table 1.3 of Environmental Statement Appendix 7.1 only six had a significance of effect of moderate adverse at summer of year 15.	
RR-0169-4	4. Green Belt, which aims to keep land permanently open, protects the land that is proposed to form the route. The Government has promised to maintain Green Belt protection. The road will be permanent, and it will increase vehicular activity in the area, which will lead to harm to Green Belt openness to a large extent, both spatially and visually. The road would harm the purposes of Green Belt, such as preventing urban sprawl, countryside encroachment, the merging of distinct areas and brownfield preference, contrary to Section 13 of the NPPF, July 2021. Very special circumstances do not exist.	As set out in the Case for the Scheme [APP-182], the location of the Scheme in the Green Belt is unavoidable as it relates to existing road routes, which are surrounded by Green Belt. The NN NPS recognises that linear infrastructure may need to pass through Green Belt land. The exception to this might be if alternative alignments not within the Green Belt are available and suitable. Of all the options presented in the alternatives assessment within Chapter 3 of the ES [APP-060], there are no viable, alternative options that would avoid works taking place within the Green Belt.	RR-0069 RR-0167 RR-0182 RR-0259 RR-0286 RR-0282 RR-0345 RR-0442 RR-0461 RR-0698 RR-0713 RR-0775 RR-0849 RR-0818
		It is considered that the Scheme does not constitute inappropriate development in the Green Belt. However, should it be considered that the Scheme does represent inappropriate development within the Green Belt, there are very special circumstances for the Scheme which outweigh the harm.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		The Scheme has been carefully designed and includes extensive mitigation to minimise visual impact on surrounding receptors and limit the impact on the openness of the Green Belt as set out within Chapter 7 of the ES - Landscape and Visual Effects [APP-063].	
		The Scheme's Green Belt location is supported by local planning policy through Policy T2: Trunk Road Developments of the Tameside Unitary Development Plan (UDP), which safeguards the route of the Scheme across the Green Belt. This policy was tested during the preparation and adoption of the UDP, which considered the Scheme's Green Belt location. The proposals for the Scheme align with the safeguarded route within the UDP and should therefore not be considered to be inappropriate development.	
RR-0169-5	5. Landscape Character harm would occur as the road will have an urbanising effect in the rural fringe location. CPRE wants areas of predominately rural character to be protected from needless development. There would be substantial adverse change to the visual amenity and landscape character value.	The assessment of landscape character considered the key characteristics of each landscape character type including characteristics of rural character (e.g. pastoral/farming landscapes, grazing meadows, gritstone farmsteads) as indicated in Chapter 7: Landscape and Visual Effects of the ES [APP-063], Table 7.27 Effects on Landscape and Townscape Areas. The landscape character value was determined by the methodology but also by the public perception of landscape value exercise undertaken by consultation (both informed by the requirements of the DMRB LA 107).	RR-0529, RR-0169, RR-0239, RR-0259, RR-0334, RR-0336, RR-0415, RR-0526, RR-0697, RR-0818, RR-0887
		The Scheme has been designed to avoid or reduce, as far as practicable, its adverse effects. A range of mitigation commitments including planting to align with local landscape character were set out in Chapter 7: Landscape and Visual Effects of the ES, Table 7.25: Essential mitigation. As a result, there are no significant residual effects on landscape and townscape character areas.	
		Mitigation commitments including planting for screening were set out in Chapter 7: Landscape and Visual Effects of the ES, Table 7.25: Essential mitigation. As a result, from a total of 19 representative viewpoints, significant residual effects would only remain for three as set out in ES, Chapter 7, Table 7.33. From a total of 141 visual receptors significant residual effects would remain for only 11 as set out in ES Chapter 7, Table 7.34.	
RR-0169-6	6. Greater Manchester 'Places for Everyone' is the Join Development Plan, (at Reg 19 consultation stage) and one of the strategic priorities is to deliver an integrated network with world class connectivity. The A57 Link Road proposed is contrary to the GMCA ambition to transition to a low-carbon economy.	The <i>Places for Everyone</i> joint development plan has yet to be submitted to the Planning Inspectorate and undergo examination in public, and the timescale for adoption is currently uncertain. Therefore, it currently carries limited weight in decision making, due to its relatively early stage of development.	
		Notwithstanding the above, <i>Places for Everyone</i> acknowledges (paragraph 10.54) that "some stretches of the city-region's motorways and trunk roads (known as the Strategic Road Network) are among the most congested and unreliable in the country" and notes that "major investment is already coming forward through the Highways England Roads Investment Strategy (RIS) to address some of these issues".	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Policy JP-C 4 highlights that improvements to the highways network are part of a multi-modal strategy to increase public transport, cycling and walking and improve access for all, and that any new infrastructure minimises the negative effects of vehicle traffic	
		The policy's supporting text references links with the <i>Greater Manchester Transport Strategy 2040 (published February 2017 and updated January 2021)</i> which explicitly references the significant investment in Greater Manchester's Strategic Road Network in recent years, primarily through the Government's Road Investment Strategy (RIS). It notes that RIS2 will see delivery of the Mottram Moor Link Road and the adjacent A57(T) to A57 Link.	
		The policy also references Greater Manches <i>ter's Five Year Transport Delivery Plan 2021-2026</i> , which references the Scheme several times. Paragraph 170 of this states that "Highways England will shortly be delivering the Mottram Moor and A57(T) to A57 Link Roads, as part of a package to improve Trans Pennine road connectivity between Greater Manchester and South Yorkshire."	
RR-0169-7	7. Post Coronavirus planning of strategic infrastructure requires an understanding of the long-term implications for travel to work and retail patterns with many people choosing to work from home and shopping online. There may be a material reduction in traffic flow through the Mottram area.	The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and is based on the DfT's National Trip End Model (NTEM), the latest version of which predates the publication of the Transport Decarbonisation Strategy. Until the DfT updates NTEM to reflect the new carbon budget and publication of the Transport Decarbonisation Strategy, National Highways can only rely on the established method of forecasting traffic growth for the assessment of the Scheme, since no alternative traffic forecasting tool currently exists.	RR-0035 RR-0115, RR-0206, RR-0271 RR-0286, RR-0331 RR-0442 RR-0447 RR-0516 RR-0671 RR-0775 RR-0880
RR-0169-8	8. Cumulative impacts should be properly assessed by National Highways, including those arising from several proposed large-scale developments, for example, the Godley Green Garden Village, which need scrutiny and adequate measures, such as mitigation at both the M67 J4 roundabout and M60 J24 Denton Island. In summary, when considering the abovementioned issues, I recommend that the application for the link road is refused. Jackie Copley MRTPI MA"	The Population and human health chapter (Chapter 12) of the ES (APP-068) considered Godley Green as follows: 'The now-abandoned Greater Manchester Spatial Framework (GMSF) proposed 2,790 homes in Tameside, this included the Godley Green development. However, it is understood that Tameside is progressing a planning application for Godley Green independently of work on any Greater Manchester plan, and a public consultation exercise on the proposals took place between February and March 2021. It should be noted that these allocations have not been made and may be subject to change.' However, the Population and human health assessment considered it prudent to continue to note allocations that were in the process of being made through the GMSF as there is a chance that these allocations could be made in later plans through 'Places for Everyone' (see R-459-6 above). The Population and human health assessment identified potential beneficial impacts on future developments, as follows (para 12.7.28 of Chapter 12 of the ES)	RR-0035, RR-0161 RR-0219 RR-0359 RR-0388 RR-0461 RR-0562, RR-0697. RR-0698, RR-0776, RR-0800



Response reference	Representation Issue	National Highways Response	Also Applies to
		'Of note, as developments identified in Table 12.12, the GMSF (now withdrawn) and High Peak Local Plan are constructed and come into active use, it is expected that there will be a noticeable increase in the amount of traffic over and above the existing conditions. Without improvements that the Scheme will bring, the road network will become highly congested resulting in considerable delays. Therefore, the Scheme presents an opportunity to support and facilitate growth.'	
		Operational activities of the Scheme are not anticipated to have significant effects on development land and business.	
		Although the Godley Green development was not included in the traffic model, meaning it has not been considered inherently within the Air Quality or Noise and vibration assessments within the ES, a conservative 'Zone of Influence' (ZoI) has been defined for the operational cumulative effects assessment using professional judgement. This informed a qualitative assessment for cumulative effects (see Chapter 15 of the ES (APP-071)). It was concluded that traffic from inhabitants of the Godley Green development may increase traffic flows on the new link roads, however it is unlikely to result in any new significant effects.	
		The traffic forecasts used for the assessment of the Scheme have been developed in full accordance with Department for Transport's (DfT) Transport Analysis Guidance (TAG). Forecast traffic growth is based on factors derived from the DfT's National Trip End model in combination with forecast changes in traffic volumes due to committed developments and schemes. The committed developments and schemes included in the traffic forecasts are those that are classified as more than likely or near certain to be implemented and listed as such in the project uncertainty log. Consequently, the National Highways transport assessment of the Scheme has properly assessed cumulative impacts.	



RR-0170 CPRE Peak District and South Yorkshire

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0170-1	not the solution. 1. Congestion and environmental pollution are caused by a majority of local commuters and a minority of through traffic of heavy lorries. Controlling the latter with a National Park-wide weight restriction, coupled with sustainable transport measures and technological improvements would bring lasting benefits and avoid the adverse impacts below. Highways England rejected this option in 2015. Far reaching changes since then - the declaration of a climate emergency; the Covid-19 pandemic; and revised Treasury rules to assess the value of new roads - make proper development of this option essential. The A628 is designated as par should provide unrestricted acc not appropriate to place a weir groads are open to all vehicles a which links Sheffield to Manche As set out in the Trans-Pennin Highways Agency, 2015 ² , Tabl the deliverability was rated as valued to travel longer distances and there could be an increase with increased HGV movement Ultimately the HGV control scheme could on police and trading standards and there could be an increase with increased HGV movement Ultimately the HGV control scheme forecasts and there forecasts and the Striction Restriction. The Case for the Scheme (AP strategy for dealing with the untatt the Scheme forecasts and that the Scheme forecasts and the Scheme forecasts and the strategy for dealing with the untatt the Scheme forecasts and the strategy for dealing with the untatt the Scheme forecasts and the strategy for dealing with the untatt the Scheme forecasts and the suitable restriction.	The M67, A57, A628, A616 corridor is part of the Strategic Road Network for which National Highways is the highway authority. As such, this corridor is identified as being a suitable route for strategic, inter-regional and inter-urban traffic, including for all types of commercial traffic such as heavy good vehicles (HGVs). Consequently, the route is included in the National Primary Road Network that connects primary destinations across the UK and has green-backed direction signs. The A628 is designated as part of the Primary Road Network and as such should provide unrestricted access to all vehicles up to 40 tonnes. As such it is not appropriate to place a weight restriction on vehicles using the A628. Our roads are open to all vehicles and this is an important Trans-Pennine route	RR-0048, RR-0048, RR-0049, RR-0050, RR-0054, RR-0058, RR-0062, RR-0069, RR-0081, RR-0115, RR-0118, RR-0126, RR-0132, RR-0133, RR-0161, RR-0169, RR-0209, RR-0211, RR-0219, RR-0225, RR-0231, RR-0225, RR-0231, RR-0239, RR-0272, RR-0285, RR-0286, RR-0312, RR-0323, RR-0324, RR-0326, RR-0331, RR-0334, RR-0334, RR-0336-5, RR-0346, RR-0363, RR-0397, RR-0400, RR-0407, RR-0409, RR-0415, RR-0439, RR-0442, RR-0447, RR-0461, RR-0467-3, RR-0479, RR-0478, RR-0479,
		which links Sheffield to Manchester As set out in the Trans-Pennine Routes Feasibility Study Stage 2 Report, Highways Agency, 2015 ² , Table 5-5, a HGV control scheme was assessed and the deliverability was rated as very difficult to deliver for a number of reasons; stakeholder acceptability was anticipated to be an issue as this option would negatively impact connectivity and associated economic growth, HGV's would have to travel longer distances which would increase carbon emissions, and be displaced to routes which would likely draw objections from members of the public which reside along such routes.	
		The HGV control scheme could place an increased burden and ongoing cost on police and trading standards, who may be required to enforce the option, and there could be an increased maintenance liability for the Local Authorities with increased HGV movements on the local network.	
		Ultimately the HGV control scheme was unable to progress as an option primarily as a result of the anticipated difficulties in enforcing a scheme that crosses many administrative boundaries.	RR-0506, RR-0512, RR-0526, RR-0528, RR-0535, RR-0553,
		Therefore, it is not appropriate to restrict access for HGVs along the M67, A57, A628, A616 corridor. Restricting access for HGVs on other roads within the Peak District National Park would be the responsibility of Derbyshire County Council as the highway authority for these roads, rather than for National Highways to consider.	RR-0571, RR-0579, RR-0631, RR-0662, RR-0671, RR-0674, RR-0698, RR-0713, RR-0721, RR-0722, RR-0734, RR-0735,
		The Case for the Scheme (APP – 182) Appendix E sets out National Highways strategy for dealing with the uncertain outcomes arising from Covid-19. It states that the Scheme forecasts and economic appraisal for the Scheme uses the revised growth projections for economic performance as issued by DfT guidance in July 2020.	RR-0734, RR-0735, RR-0737, RR-0762, RR-0775, RR-0794, RR-0795, RR-0796, RR-0798, RR-0800, RR-0801, RR-0818, RR-0825, RR-0849,

 $^{{\}color{red}{\underline{^2}}} \underline{\text{https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports}$

Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/EXAM/9.5



Response reference	Representation Issue	National Highways Response	Also Applies to
		The Environment Statement considers all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965MtCO2e, which was adopted by the Government and was due to pass into law at the time in which the Environment Statement was being prepared. The Climate Chapter reported with this policy in view and explained the impact of the Scheme on Government's ability to meet its legislated carbon reduction targets.	RR-0852, RR-0860, RR-0879, RR-0880, RR-0881, RR-0887, RR-0892, RR-0906, RR-0907
		Revisions to HM Treasury Green Book guidance, which have been incorporated into DfT guidance following the preparation of the reported scheme impacts, indicates a reduced social time preference rate (or discount rate) should be applied to health impacts. This would include factors such as air quality, safety and noise effects of the scheme. While this would result in lower levels of discounting being applied to these benefit groups, this effect would be largely offset by variations to growth assumptions. In economic terms, the noise and air quality effects of the Scheme are also forecast to largely cancel each other out, meaning that this update to Treasury methods will have limited impact on calculation of environmental effects.	
RR-0170-2	2. The scheme would increase traffic, diverting some from the M62. The benefits to most of Mottram (but not all) come at the expense of the rest of Longdendale and Glossopdale where traffic increases on many residential roads. This is contrary to national policies for modal shift to walking, cycling and public transport.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57 and the A628, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57 and A628, which means that with the Scheme traffic flows on some roads are forecast to increase, including on the A57 and the A628. The Scheme includes traffic calming of the de-trunked section of the A57 through Mottram in Longdendale to encourage through traffic to use the new link road. As a result of this traffic calming, some local traffic is also forecast to divert onto parallel local roads to avoid the traffic calmed stretch of the detrunked A57, which means that there is a forecast increase in traffic flows on some local roads in Mottram in Longdendale. The Scheme will also provide new and improved facilities for pedestrians, cyclists and horse riders throughout the route, including: • Improved pedestrian and cyclist crossing facilities at the M67 junction 4, and all new junctions created by the scheme • Crossing at the Mottram Moor junction will now be quicker and easier with the new crossroads design. We're also adding more cycling and pedestrian crossings • Replacement connections for the existing footpaths severed by the scheme • A combined footway and cycleway along the new A57 Link Road	RR-0085, RR-0090, RR-0112, RR-0118, RR-0126, RR-0131, RR-0203, RR-0208, RR-0219, RR-0223, RR-0312, RR-0335, RR-0338, RR-0345, RR-0359, RR-0404, RR-0409, RR-0404, RR-0409, RR-0472, RR-0516, RR-0528, RR-0543, RR-0593, RR-0580, RR-0593, RR-0631, RR-0674, RR-0679, RR-0698, RR-0713, RR-0720, RR-0721, RR-0750, RR-0721, RR-0750, RR-0760, RR-0762, RR-0760, RR-0762, RR-0798, RR-0830, RR-0842, RR-0849, RR-0887, RR-0892, RR-0901



Response reference	Representation Issue	National Highways Response	Also Applies to
		Mottram to the Trans-Pennine Trail (National Cycle Network route 62) • We're continuing to work with Local Authorities to improve connections on the existing A57 route	
		The Scheme is also expected to help public transport to be more reliable where it currently gets delayed, making its use a more attractive option to the public	
		At a policy level, active travel is a matter for the DfT and at a local level by other government organisations. The NN NPS identifies that relying on alternative transport is not a viable way of managing need. In respect of 'modal shift' (public transport, walking and cycling), it is not realistic to rely on these for all journeys.	
RR-0170-3	3. Road accidents would increase (102 extra collisions over 60 years) across the rest of the network. On the A57 Snake Pass, a high risk road for a fatal or serious injury crash, there would be an extra 160 extra collisions. Safety must not be compromised.	The Scheme improves journey times along the A57 and as a result it is forecast that some traffic will reroute from alternative routes across the Pennines, including the M62, to take advantage of this. Consequently, the Scheme is forecast to result in an increase in traffic using the A57 Snake Road and the A628 through the Peak District National Park.	
		This Snake Road section (including Snake Pass) of the A57 through the Peak District National Park currently has a relatively poor accident record due to several factors including, the road alignment, frequent adverse weather due to its elevation and a higher than typical proportion of motorcyclists using the road, often for leisure purposes.	
		The accident appraisal for the Scheme assumes that where there are no proposed improvements to a section of road, the accident rate will increase in proportion to the forecast increase in traffic. It is, therefore, the forecast increase in traffic on the A57 Snake Road through the Peak District National Park due to the Scheme that results in the forecast increase in accidents on this section of the A57. However, the forecast increase in accidents equates to less than a 0.3% increase across the appraised road network.	
		The Scheme does not otherwise make this section of the A57 inherently less safe.	
		A high proportion (c. 25%) of recorded accidents on the A57 Snake Road through the Peak District National Park involve motorcyclists. Motorcyclists are attracted to this section of the A57 because it offers an exciting and scenic ride due to the twisting alignment of the road through the National Park. The accident appraisal for the Scheme does not account for these very specific circumstances. It is therefore possible that the appraisal overestimates the forecast increase in accidents on this section of road, since it is unlikely that the proposed Scheme will materially change the number of motorcyclists attracted to Snake Road for leisure rides, which is one of the principal reasons for the current high accident rate.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Nonetheless, National Highways will collaborate with Derbyshire County Council to investigate what road safety improvements could be introduced on the A57 Snake Road through the Peak District National Park to reduce the potential for accidents in the future. However, any proposed improvements will not be included in the DCO for the Scheme since the A57 through the Peak District National Park is not a National Highways' road.	
RR-0170-4	4. Over 60 years the scheme would add an extra 399,867tCO2e. Carbon emissions must be tested against international and national legislation and guidance including the Paris agreement, the 2008 Climate Change Act's legally binding target of net-zero carbon emissions by 2050, the UK Sixth Carbon Budget, and the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'. Air pollution improves for some, for others NO2 remains above the legal limit e.g. on Market Street in Hollingworth. For one property on Dinting Vale air pollution gets worse. The AQMAs in Tintwistle and Glossop would remain. The Greater Manchester Clean Air Zone has been excluded from the air quality modelling but could lead to diversions to avoid paying the toll, creating congestion and pollution outside the Zone. Local countryside, highly valued for its natural undeveloped character, open views, tranquillity and recreation opportunities, would be urbanised.	The air quality assessment has been undertaken in accordance with latest best practice as set out in the Design Manual for Roads and Bridges (LA 105). A detailed assessment, including air quality modelling has been undertaken for all areas where increases and decreases in traffic flow and congestion are expected to exceed a certain level. The modelling has focused on annual mean nitrogen dioxide (NO2) as this is the pollutant for which there are current exceedances of government Air Quality Strategy (AQS) objectives. It is acknowledged that there would be increases and decreases in air pollutant concentrations due to the new link roads and the resulting redistribution of traffic on existing roads. However, the assessment undertaken for the Environmental Statement found that on balance the Scheme is expected to result in an overall improvement in local air quality for human health receptors (such as houses), with decreases in concentrations such that there is a reduction in the extent of areas where government AQS objectives are exceeded. Where there are any increases in concentrations these are not expected to result in any significant adverse effects with the Scheme. See Chapter 5: Air quality of the ES (APP-061), Section 5.9 for further details. Under the Environment Act of 1995, local authorities are responsible for assessing current air quality in their jurisdiction, developing action plans to reduce concentrations and addressing exceedances of government AQS objectives. The Scheme is a part of this action plan to reduce the extent and magnitude of exceedances of government AQS objectives, however National Highways does not have the full responsibility to remove all exceedances in the vicinity of the Scheme. Residual exceedances are still the responsibility of the Local Authority, requiring further measures to be identified and implemented. The scheme is located within the Greater Manchester Clean Air Zone (CAZ) boundary. The CAZ has been developed in parallel with the scheme, so it was not possible to c	RR-0035, RR-0049, RR-0058, RR-0062, RR-0069, RR-0080, RR-0113, RR-0115, RR-0126, RR-0132, RR-0132, RR-0207, RR-0209, RR-0225, RR-0231, RR-0239, RR-0239, RR-0239, RR-0239, RR-0236, RR-0312, RR-0316, RR-0312, RR-0336, RR-0334, RR-0334, RR-0334, RR-0334, RR-0336, RR-0359, RR-0447, RR-0461, RR-0461, RR-0461, RR-0461, RR-0467, RR-0479, RR-0479, RR-0479, RR-0479, RR-0479, RR-0526, RR-0526, RR-0526, RR-0526, RR-0526, RR-0579, RR-0604, RR-0713, RR-0715, RR-0713, RR-0715, RR-0722, RR-0734, RR-0735, RR-0739, RR-0737, RR-0739, RR-0737, RR-0739, RR-0730, RR-0730, RR-0800, RR-0801, RR-0800, RR-0801, RR-0800, RR-



Response reference	Representation Issue	National Highways Response	Also Applies to
		Chapter 14: Climate of the Environment Statement (APP-070) has been prepared in accordance with DMRB LA 114, and considers the impact on the ability of the UK Government to meet its legislated targets, including all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965MtCO2e, which was adopted by the Government and was due to pass into law at the time in which the Environment Statement was being prepared. The Climate Chapter reported with this policy in view and explained the impact of the Scheme on Government's ability to meet its legislated carbon reduction targets.	
		The greenhouse gas assessment in ES Chapter 14 has found the net effect of the Scheme would be to generate 116,341 tonnes CO ₂ equivalent that would not otherwise have been emitted, as far as the end of the sixth Carbon Budget in 2037 (Table 14.16). This is in line with the NN NPS, Paragraph 5.17, which states that applicants should provide an assessment against the Government's carbon budgets.	
		The (net) contribution of the Scheme to the Fourth Carbon Budget period would be 55,256 tCO2e (equivalent to 0.0028% of that budget), including construction and operational phase emissions. The contribution of the Scheme to the Fifth Carbon Budget would be 29,235 tCO2e (equivalent to 0.0017% of that budget), from operational emissions. The contribution of the Scheme to the Sixth Carbon Budget would be 31,850 tCO2e (equivalent to 0.0033% of that budget).	
		It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. In this context, it is considered unlikely that this Scheme will, in isolation, conclude significant effects on climate.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0170-5	 5. i)The scheme is inappropriate development in the Green Belt for which there are no 'very special circumstances' for it to proceed. ii) The impacts on the rich and diverse wildlife are minimised because species are considered only of 'local value'. iii) More traffic on routes crossing the Peak District National Park would erode its special qualities. National Park statutory purposes require the Park to be conserved and enhanced. National policy requires trunk road traffic to avoid National Parks. The transport appraisal and modelling must be scrutinised through the examination in order to ensure public confidence in the results. The modelling is based on data, assumptions and projections from before the legal acceptance of the new carbon budget and transport decarbonisation strategy and must be updated to reflect them. Cumulative effects of the scheme e.g. on the congested M60 J24 interchange, and with development in South Yorkshire and in Greater Manchester, are omitted or misrepresented." 	As set out in the Case for the Scheme (APP-182, the location of the Scheme in the Green Belt is unavoidable as it relates to existing road routes, which are surrounded by Green Belt. The NN NPS recognises that linear infrastructure may need to pass through Green Belt land. The exception to this might be if alternative alignments not within the Green Belt are available and suitable. Of all the options presented in the alternatives assessment within Chapter 3 of the ES (APP-060), there are no viable, alternative options that would avoid works taking place within the Green Belt. It is considered that the Scheme does not constitute inappropriate development in the Green Belt. However, should it be considered, that the Scheme does represent inappropriate development within the Green Belt, there are very special circumstances for the Scheme which outweigh the harm. The Scheme has been carefully designed and includes extensive mitigation to minimise visual impact on surrounding receptors and limit the impact on the openness of the Green Belt as set out within Chapter 7 of the ES - Landscape and Visual Effects (APP-60). The Scheme's Green Belt location is supported by local planning policy through Policy T2: Trunk Road Developments of the Tameside Unitary Development Plan (UDP), which safeguards the route of the Scheme across the Green Belt. This policy was tested during the preparation and adoption of the UDP, which considered the Scheme's Green Belt location. The proposals for the Scheme align with the safeguarded route within the UDP and should therefore not be considered to be inappropriate development. The Scheme has been carefully designed and includes extensive mitigation to minimise visual impact on surrounding receptors and limit the impact on the openness of the Green Belt as set out within Chapter 7 of the ES - Landscape and Visual Effects. Whilst certain species/ habitats have been classed as being of 'local' value due to being locally abundant with the Mottram area, certain rarer species (such as barn	RR-0069, RR-0080, RR-0106, RR-0113, RR-0126, RR-0133, RR-0167, RR-0182, RR-0211, RR-0239, RR-0240, RR-0259, RR-0282, RR-0286, RR-0312, RR-0323, RR-0334, RR-0336, RR-0338, RR-0345, RR-0355, RR-0415, RR-0443, RR-0442, RR-0448, RR-0461, RR-0466, RR-0526, RR-0532, RR-0571, RR-0579, RR-0590, RR-0623, RR-0662, RR-0671, RR-0673, RR-0677, RR-0698, RR-0713, RR-0735, RR-0775, RR-0795, RR-0796, RR-0803, RR-0818, RR-0849, RR-0860, RR-0887, RR-0907



Response reference	Representation Issue	National Highways Response	Also Applies to
		National Networks National Policy Statement paragraph 5.152 states "There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty".	
		The Scheme is not located within a National Park. However, given the location of the scheme in relation to the extent of the Peak District National Park (PDNP), any alternative routes avoiding the PDNP will be substantial in their extra length and could generate additional environmental effects.	
		As stated above, indirect landscape and visual effects on the National Park have been considered as part of the Environmental Statement (ES). Chapter 7: Landscape and Visual Effects of the ES (APP-063) concludes that whilst there would be a traffic change through the Peak District National Park as a result of the Scheme, these changes vary depending on the route and the time of day, and it is not considered that there would be any significant indirect effects to the landscape character or visual amenity within the Peak District National Park. Please see National Highways' response to the Relevant representation made by the Transport Action Network in respect of National Park policy (RR-0880-5) Refer to response RR-0113-1 regarding impacts on landscape and cost benefit ratio of the Scheme.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP–185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	
		The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and is based on the DfT's National Trip End Model (NTEM). The latest version of which predates the Covid-19 pandemic. National Highways recognises that the Covid-19 pandemic has, to date, had a significant effect on the people's travel patterns and traffic volumes using the road network. However, it is too early to know what the long-term impacts of the Covid-19 pandemic will be on people's travel patterns and particularly on forecast traffic growth. Until there is evidence of the likely longer-term impacts of the pandemic on peoples travel patterns that will enable revised traffic forecasts to be derived with some certainty, National Highways can only rely on the established method of forecasting traffic growth for the assessment of the Scheme that predates the Covid-19 pandemic. However, as set out in the Case for the Scheme (APP-182), the Scheme Appraisal does take account of lower forecast economic growth due to Covid-19. The M60 junction 24 is included in the traffic model used for assessment of the Scheme.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		The traffic forecasts used for the assessment of the Scheme have also been developed in full accordance with Department for Transport's (DfT) Transport Analysis Guidance (TAG). Forecast traffic growth is based on factors derived from the DfT's National Trip End model in combination with forecast changes in traffic volumes due to committed developments and schemes. The committed developments and schemes included in the traffic forecasts are those that are classified as more than likely or near certain to be implemented and listed as such in the project uncertainty log. Consequently, the National Highways transport assessment of the Scheme has properly assessed cumulative impacts.	
		Planning applications for proposed developments are required to be supported by Transport Assessments that will identify any traffic or transport related adverse impacts that they cause. The developers of these schemes are responsible for proposing and funding highway improvements to accommodate additional development generated traffic and mitigate any identified adverse impacts. It is not National Highways' responsibility to provide the additional road capacity to enable delivery of individual developments.	
		Potential cumulative effects that may arise due to the Scheme and other committed development have been considered within ES Chapter 15: Cumulative Effects (APP-071). The Cumulative Effects Assessment (CEA) follows the methodology set out in the Planning Inspectorates Advice 17: Cumulative Effects Assessment (August, 2019). The methodology used to compile the 'other development' longlist and subsequently the 'other development' shortlist is presented, in detail, in Section 15.4 of ES Chapter 15.	



RR-0239 Derbyshire Climate Coalition

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0239-1	"In response to the climate emergency, campaigners across Derbyshire set up Derbyshire Climate Coalition in February 2019. This is not aligned to any political party. The coalition is calling for local councils in Derbyshire and Derby to lead and develop plans to make their local areas 'zero carbon' by 2030. We object to the scheme for the following reasons:	Please refer to National Highways' responses to the Peak District National Park Authority Relevant Representation (RR-0677-13) and Climate Emergency Planning and Policy (RR-425).	RR-0058, RR-0326 RR-0698-8, RR-0713 RR-0734, RR-0735
	The scheme would emit 399,867tCO2e of additional carbon emissions over a 60year period from 2025. During the critical period up to 2030 the scheme would emit an additional 55,253tCO2e during UK's 4th carbon budget period (2023-2027) and an additional 29,231tCO2e during the UK's 5th carbon budget period (2028-2032). No carbon assessment has been made for the period of 2038 to 2050 by the end of which the UK is legally required to achieve net-zero. Quantifiable carbon reductions at the local level are a fundamental part of local transport planning and funding (Government's Transport Decarbonisation Plan, August 2021) Carbon emissions must be tested against international and national legislation and guidance including the Paris Agreement, the 2008 Climate Change Act's legally binding target of net-zero carbon emissions by 2050, the UK Sixth Carbon Budget, science-based carbon budgets from the Tyndall Centre, and the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'.		
RR-0239-2	The scheme would increase traffic, diverting some from the M62. The benefits to most of Mottram (but not all) come at the expense of the rest of Longdendale, Glossopdale and other parts of Derbyshire where traffic increases on many residential and rural roads. This is contrary to national policies for modal shift to walking, cycling and public transport. Modal shift is a strategic priority for the Government's Transport Decarbonisation Plan – 'Public transport and active travel will be the natural first choice for our daily activitiesWe will use our cars differently and less often' – but the scheme would increase car dependency.	Please refer to National Highways' response to the Relevant Representation from the Peak District National Park Authority (RR-0677-1) with respect to changes to traffic flows. Please refer to National Highways' responses to the Relevant Representations from CPRE Peak District and South Yorkshire (RR-0170-2) and Climate Emergency Planning and Policy (RR-0161). The Scheme is in line with the government commitment to provide people with options to choose alternative modes of transport and making door-to-door journeys by alternative means an attractive and convenient option. This is in accordance with wider transport strategy locally and nationally. We support improvement of walking, cycling, and horse riding routes, as well as improvements to public transport. The Scheme will improve local walking, riding and horse riding routes in the area and we are working with Local Authorities and local interest groups to ensure this is done the right way, as well as Transport for Greater Manchester and Transport for the North. Please see National Highways' response to the Relevant Representation made	RR-0126, RR-0286 RR-0324, RR-0359 RR-0713



Response reference	Representation Issue	National Highways Response	Also Applies to
		The main pathway element recommended by the UK Climate Change Committee (CCC) for transport and transport infrastructure is electrification of the national fleet. This will require a fit-for-purpose road network with adequate capacity. The CCC's 'core' and 'further ambition' scenarios both include an element of modal shift to non-road transport. However, road transport remains the central focus of policy and will continue to require appropriate infrastructure. It is noted in the CCC report that reaching net-zero emissions will require the development or enhancement of shared infrastructure to enable many of the actions which are required. Although infrastructure development will generate some GHG emissions, it is not precluded but encouraged in the right instances by the CCC. This is supported by the NPS NN which states that generation of emissions is in itself not a reason to refuse development consent, particularly when the magnitude of these emissions is small in comparison with the reductions which will be generated by improvements such as electrification of the fleet. Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council in respect of fleet assumptions (RR-0240-22).	
RR-0239-3	The natural world is also in a state of emergency, with the net loss of biodiversity in the UK continuing. The scheme involves fragmentation, loss or displacement of diminishing wildlife habitats such as wet grazing meadows and of protected species, such as bats and barn owls. The impacts on the rich and diverse wildlife are minimised because species are considered only of 'local value'. Conserving and enhancing local wildlife as well as the rare is essential to nature's and our survival. Encroachment of development on the countryside must be stopped if biodiversity loss is to be halted and reversed.	Please refer to National Highways' response to the Relevant Representation of the Friends of the Earth England, Wales and Northern Ireland (RR-0281-4).	
RR-0239-4	The applicant has failed to scrutinise alternatives that would avoid all the adverse impacts the Link Roads would impose on local people and the environment. De-trunking of the A628T corridor with a Park-wide ban on through traffic of heavy lorries, substantial improvements for safe walking and cycling, and for buses throughout Glossopdale and Longdendale would reduce traffic and carbon emissions and allow people to travel without needing a car."	Please refer to National Highways' response to the Relevant Representation of CPRE Peak District and South Yorkshire (RR-0170-1) with regards to vehicle restrictions. Please refer to National Highways' response to the Relevant Representation of Trans Pennine Trail (RR-0879-1) with regards to improvements for walking and cycling. With the Scheme, bus services will continue to operate along the de-trunked section of the A57 and will not use the new link road. Consequently, bus services will benefit, in terms of both journey times and journey time reliability, from the removal of traffic congestion and delay on the de-trunked section of the A57 due to the Scheme.	



RR-0281 Friends of the Earth England, Wales and Northern Ireland

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0281-1	"We object to the scheme for the following reasons: 1. Over 60 years the scheme would add an extra 399,867 tonnes carbon dioxide. Carbon emissions must be tested against international and national legislation and guidance including the Paris Agreement, the 2008 Climate Change Act and UK Sixth Carbon Budget that legally commits the UK to a 78% reduction in emissions (compared to 1990 levels) by 2035, and the National Planning Policy Framework which requires "radical reductions of greenhouse gas emissions". The Committee on Climate Change's 2021 Progress Report states "Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions".	Please refer to National Highways' response to the Sheffield Climate Alliance Relevant Representation (RR-423) in respect of compliance with carbon policy. Please refer to National Highways' response to the CPRE Peak District and South Yorkshire Relevant Representation (RR-569-4) in respect of assessment of carbon. Please refer to the Net Zero Highways Plan for the commitments that have been raised in relation to the UK's Pathway to Net Zero. This includes a 'pathway' of emissions reductions targets, starting from a baseline in 2020 through to Net Zero emissions by 2050.	
RR-0281-2	2. The scheme would increase traffic. The benefits to Mottram (but not those on Market Street or near the new underpass) come at the expense of the rest of Longdendale and Glossopdale where traffic increases on many residential roads. This does not comply with national policies for climate change and modal shift to walking, cycling and public transport.	See the response by National Highways to the Relevant Representation made by CPRE Lancashire, Liverpool City Region and Greater Manchester in respect of national policies on climate change (RR-0169-7). Please see National Highways' response to the Relevant Representation made by the CPRE Peak District & S. Yorkshire in respect of Modal Shift and NN NPS (RR-0170 (2)).	
RR-0281-3	3. Air pollution improves for some households but for others nitrogen dioxide remains above the legal limit. The Air Quality Management Areas in Tintwistle and Glossop would remain. The Greater Manchester Clean Air Zone has been excluded from the air quality modelling therefore its impacts on traffic flows and routes have not been included in air pollution assessments of the scheme.	The air quality assessment has been undertaken in accordance with latest best practice as set out in the Design Manual for Roads and Bridges. A detailed assessment, including air quality modelling has been undertaken for all areas where increases and decreases in traffic flow and congestion are expected to exceed a certain level. The modelling has focused annual mean nitrogen dioxide (NO ₂) as this is the pollutant for which there are current exceedances of government Air Quality Strategy (AQS) objectives. It is acknowledged that there would be increases and decreases in air pollutant concentrations due to the new link roads and the resulting redistribution of traffic on existing roads. However, the assessment undertaken for the Chapter 5: Air Quality of the Environmental Statement [APP-061] found that, on balance, the Scheme is expected to result in an overall improvement in local air quality for human health receptors (such as houses), with decreases in concentrations such that there is a reduction in the extent of areas where government AQS objectives are exceeded. Where there are any increases in concentrations these are not expected to result in any significant adverse effects with the Scheme. See Chapter 5 Section 5.9 of the ES for further details.	



Response reference	Representation Issue	National Highways Response	Also Applies to
1616161166			
		Under the Environment Act of 1995, local authorities are responsible for assessing current air quality in their jurisdiction, developing action plans to reduce concentrations and addressing exceedances of government AQS objectives. The National Highways Scheme is a part of this action plan to reduce the extent and magnitude of exceedances of government AQS objectives, however National Highways does not have the full responsibility to remove all exceedances in the vicinity of the Scheme. Residual exceedances are still the responsibility of the Local Authority, requiring further measures to be identified and implemented.	
		The Scheme is located within the Greater Manchester Clean Air Zone (CAZ) boundary. The CAZ has been developed in parallel with the scheme, so it was not possible to consider it in the traffic and air quality modelling. However, the air quality assessment undertaken, which does not include the CAZ, can be considered a worst case as the expected improvements in road traffic emissions as a result of the CAZ have not been accounted for in the assessment. It is anticipated that the CAZ would bring about further improvements in concentration of annual mean NO ₂ .	
RR-0281-4	5. (a) The scheme involves fragmentation, loss or displacement of diminishing wildlife habitats such as wet grazing meadows and of protected species, such as bats and barn owls. The impacts on the rich and diverse wildlife are minimised because species are considered only of 'local value'. (b) Local countryside, highly valued for its natural, undeveloped character and open views, would be urbanised and the Green Belt would be bisected.	The Scheme has been designed to achieve a net gain of notable habitats within the Scheme boundary. Overall, this includes:	
		+5.35 ha lowland mixed deciduous woodland	
		+0.54 ha wet woodland	
		+1.33 ha lowland dry acid grassland	
		+2,688 m hedgerows	
		+0.83 ha flood plain mire	
		Fragmentation effects relating to biodiversity have been considered within the design of the A57 Link Road Scheme based on species recorded during ecological surveys in support of the Scheme. The ecological baseline, potential impacts, and mitigation/ enhancement have been provided within the Environmental Statement (APP-064).	
		Several features have been incorporated into the design to retain connectivity and prevent road casualties. Five mammal passes (in the form of purpose-built piped crossings) would be installed along the road network in strategic locations, as shown on the Scheme Layout Plans (APP-011), to increase the permeability of the Scheme for badgers and other mammals (such as brown hare and hedgehogs) and reduce the barrier effect. Furthermore, connectivity is retained through three underpasses, six culverts, and the River Etherow Bridge which would be utilised by a range of species. The entrances would be 'softened' through the use of appropriate planting to encourage badgers and other mammals to use these crossing points. Linear fencing would be utilised to prevent road mortalities and guide animals to the safe crossing points.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		'Fly-overs' and screen planting would be provided in strategic locations which would consist of tall vegetation planted on either side of the road, with the aim of encouraging bats and barn owls to cross the road at a safe height above traffic. These features will prevent road mortality and provide crossing points for these species along existing commuting routes over the highway to prevent fragmentation.	
		Barn owls have been recorded foraging within the habitats within the Scheme and mitigation measures have therefore been incorporated into the design. This includes a significant increase of species-rich grassland, hedgerow, and woodland edge habitat throughout the Scheme. The locations of these habitats are outlined within the Scheme Layout Plans (APP-011).	
		Mitigation has been provided for bats, including a purpose-built bat tower which has the potential to house up to 200 bats (which is significantly above the potential worst-case scenario (in the absence of up-to-date bat roosting surveys) for roosting bats of four common pipistrelle maternity roosts and nine day and/ or satellite roosts). Further artificial bat boxes (at least 37) have been incorporated around the site as well as a significant gain in suitable habitats, including woodland, species rich grassland, and hedgerows that will provide enhanced habitat for bats.	
		Where fragmentation would occur through the loss of an area of approximately 0.3 ha of deciduous woodland through the installation of the Mottram Underpass, new planting would be incorporated on the overpass (including a landscaped park area) to ensure that a green corridor is retained.	
		Whilst certain species/ habitats have been classed as being of 'local' value due to being locally abundant with the Mottram area, certain rarer species (such as barn owl, bats, and priority habitats) have been classed as 'county value'. In this instance, further emphasis has been put on the conservation of these species/ habitats. However, even if a species has been classed as being locally abundant, appropriate mitigation to ensure there will be no significant adverse impacts has been provided as outlined within the Environmental Statement (APP-064).	
		Please refer to National Highways' response to the Relevant Representation from CPRE Lancashire, Liverpool and Greater Manchester (RR-0169-4) with respect to Green Belt.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0281-5	6. Genuine solutions for congestion, air pollution and climate emissions should be pursued instead of building new road capacity – for example a ban on lorries, sustainable transport measures, and technological improvements. These measures would bring lasting benefits and avoid adverse impacts. Highways England rejected this option in 2015. Far reaching changes since then - as the climate crisis has come to the fore, the impacts of the Covid-19 pandemic, and a review of the Treasury's rules to assess the value of roads - make scrutiny of this option essential.	Please refer to National Highway's response to the Relevant Representation from CPRE Peak District and South Yorkshire (RR-0170-1).	
RR-0281-6	7. The Peak District National Park is a haven for wildlife, carbon storage and a place where everyone can get outdoors and enjoy nature. More traffic on roads would harm these special qualities. National policy requires trunk road traffic to avoid National Parks.	Please refer to National Highway's response to the Relevant Representation from the Transport Action Network (RR-0880-5).	
RR-0281-7	8. The transport appraisal and modelling must be made available and scrutinised through the examination in order to ensure public confidence in the results. The modelling is based on data, assumptions and projections from before the Covid pandemic and must be updated to reflect recent and future levels of home-working and the shift towards virtual meetings."	Please refer to National Highway's response to the Relevant Representation from Derbyshire County Council (RR-0240-23).	



RR-0282 Friends of the Trans Pennine Trail

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0282-1	"The Friends of the Trans Pennine Trail object to the scheme primarily because it would adversely affect the enjoyment of Trail Users.	Please see National Highways response to the Relevant Representation made by CPRE Lancashire, Liverpool and Greater Manchester (RR-459-4)	
	1. The local countryside, highly valued for its natural undeveloped character and open views, would be urbanised and the Green Belt would be cut in two.	The landscape character and visual amenity views have both been considered. The former was set out within ES Chapter 7, Table 7.26 Effects on Landscape and Townscape Character Areas where the key characteristics of each landscape character type was described and the magnitude of change upon them was given. A range of visual receptors have been considered. Views from the Trans-Pennine Trail are represented by viewpoints 14 (A57 south of Woolley Bridge),15 (Trans-Pennine Trail near Padfield Road), 20 (Pennine Trail near Torside Car Park), 24 (Trans-Pennine Trail near Woodhead) and 25 (Trans-Pennine Trail near Pikenaze Moor). Viewpoint 14 had a moderate adverse effect at winter of year one reducing to slight adverse at summer of year 15. This was because views would include the new junction at Woolley Lane and associated lighting and the new River Etherow Bridge. With mitigation planting established, these elements would not detract from visual amenity.	
		Viewpoint 15 was approx. 2km distant from the Scheme and would not have any significant effect upon visual receptors.	
		The remaining viewpoints were all within the PDNP which has no view of the Scheme. These viewpoints have been included to assess the change in traffic. However, due to the existing traffic acting as a detractor to the experience for the visual receptor, the effect was judged to be neutral.	
RR-0282-2	2. It would increase traffic on adjoining roads that are part of the Trail, increase CO2 emissions (Over 60 years of operation the scheme would add an extra 399,867 tonnes of carbon dioxide) adversely affect air quality	Please see National Highways response to the Relevant Representation made by the Transport Action Network (RR-0880-1)	
RR-0282-3	3. Fragment wildlife habitats and hamper efforts to promote Active Travel and modal shift to walking, cycling and the use of Public Transport, thus going against publicly stated government targets.	A Walkers, Cyclists and Horse-riders (WCH) Assessment, which is referred to in Section 2.20 of the Case for the Scheme (APP-182), was undertaken for the Scheme and informed the Chapter 12: Population and Human Health Chapter of the ES (APP- 068). The WCH assessment studied the existing rights of ways and investigated how they can be improved and enhanced. The proposals were presented to WCH groups during statutory consultation and comments were considered and addressed.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Chapter 12: Population and Human Health of the Environmental Statement (APP-068) finds that, during construction, the works have the potential to result in a Negative Health Outcome owing to temporary severance, disruptions to access, pedestrian and cyclist delays an increases in journey length as well as temporary loss of amenity on affected PRoWs. Temporary diversions are such that moderate adverse effects are anticipated for PRoW 35/10, 50/10, 52/10, 52/10, 97/10,88/60, 90/10, 52/20, 52/30, and an unnamed footway (Harrop Edge Road to Hyde Road on Hattersley Roundabout). Motorised vehicle travellers and/or other public transport users in the study area are also likely to face temporary disruptions to travel activity, delays and/or increased commuter times due to construction activities, increases in construction vehicles, introduction of restrictions and diversion routes and traffic management. This may result in some wider groups and vulnerable groups having to change their travel patterns or find alternative arrangements. Lower income groups and vulnerable groups could be disproportionately affected by any impacts. While temporary during the construction phase, this is also considered to result in a Negative Health Outcome. During operation, provision of improvements on the existing A57(T) and A57 with the possible inclusion of cycle lanes, improved pedestrian and cyclist crossing facilities at the M67 Junction 4, and all new junctions created by the scheme, upgrading of the PRoW LON 52-20 from a footpath to a bridleway, increasing the availability of suitable equestrian facilities away from road traffic and creation of a combined footway and cycleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans-Pennine Trail (National Cycle Network route 62) are associated with a Positive Health Outcome and Moderate Beneficial effects for	
		In respect of social cohesion, during operation the Scheme would reduce community severance through the separation of local and regional traffic resulting in large reductions of traffic on the existing A57. This will allow the opportunity to make this stretch of road much more friendly to cyclists and pedestrians (across all groups) through improved facilities and crossings, public realm improvements and reduction in speed. This is anticipated to lead to positive benefits to health and wellbeing and is therefore associated with a Positive Health Outcome. Traffic congestion issues will be alleviated with significant reductions in traffic predicted at Mottram Moor (between Back Moor and Stalybridge Road, Hyde Road and Woolley Lane), therefore providing a safer and more pedestrian friendly environment in the village. The scheme makes considerable provisions for WCH, improving connectivity and the new bypass will also provide for more reliable, shorter journey times.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Fragmentation effects relating to biodiversity have been considered within the design of the A57 Link Road Scheme based on species recorded during ecological surveys in support of the Scheme. The ecological baseline, potential impacts, and mitigation/ enhancement have been provided within the Chapter 8; Biodiversity of the ES (APP-064).	
		Several features have been incorporated into the design to retain connectivity and prevent road casualties. Five mammal passes (in the form of purpose-built piped crossings) would be installed along the road network in strategic locations, as shown on the Scheme Layout Plans (APP-011), to increase the permeability of the Scheme for badgers and other mammals (such as brown hare and hedgehogs) and reduce the barrier effect. Furthermore, connectivity is retained through three underpasses, six culverts, and the River Etherow Bridge which would be utilised by a range of species. The entrances would be 'softened' through the use of appropriate planting to encourage badgers and other mammals to use these crossing points. Linear fencing would be utilised to prevent road mortalities and guide animals to the safe crossing points.	
		'Fly-overs' and screen planting would be provided in strategic locations which would consist of tall vegetation planted on either side of the road, with the aim of encouraging bats and barn owls to cross the road at a safe height above traffic. These features will prevent road mortality and provide crossing points for these species along existing commuting routes over the highway to prevent fragmentation.	
		Where fragmentation would occur through the loss of an area of approximately 0.3 ha of deciduous woodland through the installation of the Mottram Underpass, new planting would be incorporated on top of the underpass to ensure that a green corridor is retained.	
		At a policy level, active travel is a matter for the DfT and at a local level by other government organisations. The NN NPS identifies that relying on alternative transport is not a viable way of managing need. In respect of 'modal shift' (public transport, walking and cycling), it is not realistic to rely on these for all journeys.	
RR-0282-4	4. Air Quality Management Areas in Tintwistle and Glossop would still be needed and the increase in traffic will harm the delicate ecology of the Peak District National Park.	Under the Environment Act of 1995, local authorities are responsible for assessing current air quality in their jurisdiction, developing action plans to reduce concentrations and addressing exceedances of government Air Quality Strategy (AQS) objectives. The National Highways Scheme is a part of this action plan to reduce the extent and magnitude of exceedances of government AQS objectives, however National Highways does not have the full responsibility to remove all exceedances in the vicinity of the Scheme. Residual exceedances within local AQMAs are still the responsibility of the Local Authority, requiring further measures to be identified and implemented.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		The air quality assessment for the Scheme as presented in the Environmental Statement (Chapter 5, APP-061) found that, on balance, the Scheme is expected to result in an overall improvement in local air quality for human health receptors (such as houses), with decreases in concentrations such that there is a reduction in the extent of areas where government AQS objectives are exceeded. Where there are increases in concentrations these are not expected to result in any significant adverse effects with the Scheme, including within the locally declared AQMA.	
		With regard to the Tintwistle and Glossop AQMAs, the study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with latest best practice guidance as set out in Highways England Design Manual for Roads and Bridges (DMRB) LA 105 air quality guidance. The DMRB LA 105 guidance defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1). The traffic change criteria were applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A57 through the Glossop AQMA and the A628 through the Tintwistle AQMA. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement [APP-061]. The traffic change criteria are not exceeded for the A628 through the Tintwistle AQMA. For the Glossop AQMA the traffic change criteria are not exceeded for the A57 south of the Dinting Vale junction. The A57 north of the Dinting Vale junction and the A626 Glossop Road do exceed the traffic change criteria and the Dinting Vale junction, which is within the Glossop AQMA has been included in the air quality modelling presented in Chapter 5: Air quality of the ES [APP-061]. Where traffic change criteria are not exceeded this would indicate that the scheme is not having a significant adverse effect on air quality due to the Scheme in these locations.	
		Assessment of the air quality impacts of the Scheme at ecological receptors (designated sites) found no significant air quality effects due to the Scheme, including receptors within the internationally designated sites Peak District Moors SPA and South Pennine Moors SAC, which cover large sections of the Peak District National Park. See Chapter 5: Air quality, Section 5.9 of the ES (APP-061) and Habitats Regulations Assessment Screening Report (APP-054) for further details.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0282-5	5. A proper assessment of alternative options needs to be carried out.	In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Environmental Statement includes a description of the reasonable alternatives studied by National Highways, which are relevant to the Scheme and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment. on the environment. This is presented in Chapter 3 Assessment of alternatives of the Environmental Statement (APP-060). The current Scheme has evolved over more than 50 years as different ideas have been considered and discarded to address the longstanding connectivity and congestion issues identified. Table 3-1 of Chapter 3 provides the timeline of the 50-year history of the different schemes explored and clarifies where the alternatives to the specific Scheme assessed in this ES are considered. Whilst the Scheme assessed in the Environmental Statement is presented as a separate Scheme to those considered before the TransPennine feasibility studies published in 2015, note has been taken of earlier options. The current design development has therefore been informed by historic study information. In developing options for the Scheme, a range of highway options were assessed in terms of delivering Scheme objectives, cost and key issues and risks.	
RR-02825-6	6. Should the scheme go ahead the Friend's concern is to ensure that the maximum benefit is achieved for Trail users and other participants in Active Travel in the area. The current A57 route must be re-modelled to give priority to walkers, cyclists and public transport users, otherwise both roads will simply fill up with traffic and there will be a net dis-benefit. Initial discussions with Highways England have identified a number of improvements that could be made to the scheme and we intend to ensure that implementation of these is carried out if the scheme goes ahead. Highways England has a poor record on delivery of Active Travel measures and this must not happen in this case."	 A Walking, Cycling and Horse-riding (WCH) assessment was completed to provide an assessment of the existing facilities and provision for pedestrians, cyclists and equestrians that will help inform decision making throughout the design process. The provisions include: Replacement connections for the existing footpaths and bridleways severed by the Scheme and in particular severed public right of way connections between Hyde Road and Edge Lane will be reconnected via a new bridleway, thereby increasing the availability of equestrian facilities away from road traffic. Improved pedestrian and cyclist crossing facilities at the M67 Junction 4 and all new junctions created by the scheme to improve safety and accessibility for users A combined footway and cycleway along the new A57 Link Road between Mottram Moor and Woolley bridge, this will also include a new connection with the National Cycle Network Route 62 where it connects to Woolley Bridge as part of the new Woolley Bridge Junction 	



Response reference	Representation Issue	National Highways Response	Also Applies to
		 A new bridleway linking in with the local public right of way has been introduced from Old Hall Lane, on top of the cutting going down the Scheme and linking back in with Mottram Moor Junction as a direct result of consultation with cycling, horse riding and walking groups and Local Authorities 	
		Walkers cyclists and horse riders would be encouraged to use the new dedicated facilities provided by the Scheme together with those provided along the existing A57 corridor, through the provision of safe crossing points and appropriate signage designed to ensure the safety of users.	
		We are currently working with the relevant local authorities to ensure that all walking, cycling and horse riding provision on the existing A57(T) and A57 would be maintained, with possible improvements as part of the traffic calming measures which are being proposed to slow down local traffic and discourage through traffic from using this route. Any cycle lanes delivered by the Scheme would also be designed for future cycle lane connectivity.	



RR-0303 Glossopdale Branch Labour Party

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0303-1	"Glossopdale branch Labour Party is made up of residents from across the Glossopdale area, including Glossop, Hadfield, Padfield, Tintwistle, Gamesley, Charlesworth and Chisworth This branch believes that the proposed A57 Link Roads Scheme will do nothing to relieve the problems of traffic congestion and noise and air pollution in Tintwistle and the wider Glossopdale area. On the contrary, according to the proposers of the scheme themselves, traffic is predicted to increase, including on Glossop High St and through Tintwistle, whose residents and elected representative have already made clear to us how disappointed they are with the proposed scheme, which will not by-pass the village.	The Scheme aims to improve journeys between Manchester and Sheffield, as this route currently suffers from heavy congestion which creates unreliable journeys. The aim of the Scheme is to move traffic from heavily congested roads (such as the A57 through Mottram) adjacent to residential properties and redistribute it on other routes mostly extending through rural and industrial areas, resulting in an overall benefit in local air quality. The Scheme is specifically to relieve congestion in Mottram and it does not include any work in Glossop. National Highways is a Government company charged with maintaining and improving the Strategic Roads Network (SRN). National Highways is a delivery company for Department for Transport (DfT). National Highways does not determine which projects are to be delivered within the Government's Roads Investment Strategy (RIS) or have responsibility for setting transport policy. Studies into a Mottram, Hollingworth and Tintwistle bypass were carried out over a number of years but this bypass was widely opposed during public consultation and not taken forward. A Department for Transport feasibility study into Trans-Pennine routes, published in 2015 ³ , explains the process followed to examine the feasibility of the various options and the decisions made). The study also showed that the most critical issues were in the area of Mottram, which the Scheme aims to address. With TfN and DfT National Highways is continuing its work looking at this strategic link. A single-bore tunnel, recommended by TfN, is likely to be very challenging to deliver and have a weak economic case. In conjunction with DfT and TfN, we are also examining improvements to the A628/616 as part of this study.	RR-0085, RR-0090 RR-0112, RR-0118 RR-0126, RR-0131 RR-0203, RR-0208 RR-0219, RR-0223 RR-0312, RR-0335 RR-0338, RR-0345 RR-0359, RR-0400 RR-0404, RR-0409 RR-0472, RR-0516 RR-0528, RR-0543 RR-0579, RR-0580 RR-0593, RR-0631 RR-0674, RR-0679 RR-0698, RR-0713 RR-0720, RR-0721 RR-0750, RR-0721 RR-0750, RR-0760 RR-0762, RR-0776 RR-0783, RR-0798 RR-0845, RR-0830 RR-0847, RR-0849 RR-0887, RR-0892 RR-0901

Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/EXAM/9.5

 $^{{\}color{red}^{3}} \ \underline{\text{https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports}$



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0303-2	More traffic will lead to more air pollution and	The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with latest best practice as set out in National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The key traffic change criteria are the flow change criteria - a change of over 1000 AADT and a change of over 200 HDV with the Scheme compared to without the Scheme in the opening year of 2025. The traffic change criteria were applied to output from the scheme specific traffic model to determine the Affected Road Network (ARN). The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP-076). The traffic increases due to the Scheme along the A57 Dinting Vale and the A57 High Street West in Glossop, and the A628 Woodhead Road in Tintwistle do not meet the traffic screening criteria set out in the DMRB, therefore receptors at these locations have not been included within the air quality assessment. Where traffic change criteria are not exceeded this indicates that there would not be a significant adverse effect on air quality due to the Scheme in these locations. Finally, it should be noted that under the Environment Act of 1995, local authorities are responsible for assessing current air quality in their jurisdiction, developing action plans to reduce concentrations and addressing exceedances of government Air Quality Strategy (AQS) objectives. The Scheme is a part of this action plan to reduce the extent and magnitude of exceedances of government AQS objectives, however National Highways does not have the full responsibility to remove all exceedances in the vicinity of the Scheme. Residual exceedances are still the responsibility of the Local Authority,	
RR-0303-3	more accidents, including more fatalities Heavy traffic of lorries,	Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council (RR-0240-6).	
RR-0303-4	noise and pollution will continue to blight residents' lives.	Overall, the operation phase noise assessment provided in Chapter 11 Noise and Vibration of the ES [APP-067] found that the Scheme would result in more significant beneficial effects than significant adverse effects, and would improve noise levels at a Noise Important Area. The noise assessment provided in [APP-067] considered the potential noise impacts at locations adjacent to the Scheme and at locations on the wider road network. As shown in Figure 11.5 [APP-134], the traffic network considered for the operation phase noise assessment encompassed Glossopdale (Glossop, Hadfield, Padfield, Gamesley, Charlesworth and Chisworth), and locations with a	



Response reference	Representation Issue	National Highways Response	Also Applies to
		potential for a noise change of 1dB or higher were assessed in more detail as required by the DMRB LA111.	
		The blue lines in Figure 11.5 represent noise increases or decreases that are less than 1dB LA10,18h. Negligible impacts were predicted to occur at these locations, which include the A628 through Tintwistle, Hadfield, Padfield, Glossop High Street, Long Lane (Charlesworth) and Town Lane (Charlesworth). Negligible changes in noise are not perceptible and would not result in a significant effect.	
		The purple hatched areas in Figure 11.5 represent roads where increases or decreases of 1dB L _{A10,18h} or more were predicted. The impacts at these locations are described below:	
		 At Charlesworth and Chisworth, lower traffic flows on the A626 Glossop Road/Marple Road were predicted to result in minor decreases in the short-term. These noise decreases would be perceptible and result in beneficial impacts. Negligible noise decreases were predicted from the A626 in the long-term. 	
		 Minor short-term noise decreases were predicted at A626 Glossop Road (Gamesley). This would be perceptible and benefit residential properties in the south east of Gamesley (such as Castleton Crescent). Negligible noise decreases were predicted at Glossop Road in the long-term relative to current conditions. 	
		 Minor short-term noise increases were predicted at the Brookfield, which may be perceptible to residential properties in the north east of Gamesley (such as Hathersage Crescent) depending on the level of shielding provided by industrial and commercial premises located adjacent to Brookfield. Negligible noise increases were predicted at Brookfield in the long-term. 	
		 Minor short-term noise increases were predicted at Ellison Street (Glossop) and Dinting Road (Glossop), which would be perceptible. However, by the future year the increase would have a negligible impact according to DMRB LA 111 criteria 	
		 Traffic flows on A57 Sheffield Road (east of Glossop) would increase to give a perceptible noise increase in the short-term. However, by the future year the increase would have a negligible impact according to DMRB LA 111 criteria. 	
		 Traffic flow increases on New Road (Tintwistle) and Waterside (Hadfield) linked to the avoidance of traffic calming measures on Woolley Lane would lead to minor increases in noise in the short-term and negligible increases in the long-term. The noise increases would be perceptible in the short-term at noise sensitive receptors adjacent to these roads. 	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0303-5	With each consultation since 2017 local people have consistently and repeatedly asked for measures to relieve Tintwistle of these impacts. During the 2018 consultation, Highways England reported this as one of 'the key concerns raised during the consultation that we are unable to resolve'.	Studies into a Mottram, Hollingworth and Tintwistle bypass were carried out over a number of years but this bypass was widely opposed during public consultation and not taken forward. A Department for Transport feasibility study into Trans-Pennine routes, published in 2015, explains the process followed to examine the feasibility of the various options and the decisions made https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports). The study also showed that the most critical issues were in the area of Mottram, which the Scheme aims to address.	RR-0905
RR-0303-6	Alternative solutions do exist. A ban on through lorry traffic through the National Park, 20 mph speed limits and more space for pedestrian and cyclists, together with a better funded and integrated public transport system would address the current situation more quickly and would provide much better value for money.	Please refer to National Highways' response to the Relevant Representation of CPRE Peak District and South Yorkshire (RR-0170-1) with regards to vehicle restrictions. Please refer to National Highways' response to the Relevant Representation of Trans Pennine Trail (RR-0879-1) with regards to improvements for walking and cycling. and National Highways' response to the Relevant Representation made by the CPRE Peak District & S. Yorkshire in respect of Modal Shift and NN NPS (RR-0170).	
RR-0303-7	The half-baked,half by-pass will not solve the major problem of traffic congestion in Glossopdale. It will simply move it a little further down the road. The by-passing of Mottram will feed more traffic on to the roads in and out of Glossop, which are already at gridlock for much of the day.	Please see the response by National Highways to the Relevant Representation made by Sharefirst my journey to school (RR-0796-4).	
RR-0303-8	The huge disruption and inconvenience it will cause during construction will result in little or no benefit for the residents of our community"	The Scheme will deliver a range of benefits both strategically and locally. As explained in the Case for the Scheme (APP-182). The construction of the scheme will be governed by the Construction, Design and Management Regulations and we are developing a Construction Environmental Management Plan (CEMP) to ensure that health and safety are at the heart of everything we do, that disruption is kept to a minimum for road users and our neighbours and that we do everything we can to protect the environment. Where there are impacts, these will be mitigated appropriately. We will work with our contractors (Balfour Beatty Atkins) in consultation with all relevant authorities to develop the plan. This will include detail about potential impacts such as noise and vibration, dust and visual impact and how these will be mitigated. We will also develop a traffic management plan in consultation with the local authorities and police that keeps delays and inconvenience to the absolute minimum. On completion the Scheme will relieve traffic congestion in the Mottram in Longdendale, Hattersley and Woolley Bridge area, providing benefits to local drivers who will have reduced journey times with greater reliability and improving connectivity for local traffic.	RR-0118, RR-0303-1, RR-0796-11



Response reference	Representation Issue	National Highways Response	Also Applies to
		The Scheme will also support Walking Cycling Horse riding (WCH) safety in the local area as footways/cycleways and bridleways are improved, alongside identified road crossings.	



RR-0331 High Peak Green New Deal

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0331-1	"High Peak Green New Deal is both a Local Hub of Green New Deal UK and a Climate Action Group, linked to Friends of the Earth. Our goals are to decarbonise High Peak, create secure jobs, transform the economy, protect and restore nature, and promote global justice. We object to the A57 Link Roads for the following reasons: These new roads were promised to relieve congestion in Glossopdale and they will not do that. Traffic is predicted to increase, including on residential roads within the town but also in the wider High Peak, in the Hope Valley and across the Peak Park. More traffic would lead to more road danger, making it less likely people would walk and cycle for local journeys, and increasing car dependency. Government policy sees active travel as a priority 'for our daily activitiesWe will use our cars differently and less often'.	The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	RR-0415, RR-0540, RR- 0697
RR-0331-2	More traffic means more carbon emissions, at a time when nearly everyone recognises that emissions need to be reduced dramatically, to prevent runaway climate change. Over the next 8 years the UK has promised to reduce climate emissions by 68% as part of its commitment to the Paris Agreement. This scheme takes us in the wrong direction and would emit ~ 84,500tCO2 over the next two critical carbon budget periods and nearly 400,00tCO2 over the next 60 years.	Please see the response by National Highways to the Relevant Representation made by the Peak District National Park Authority (RR-0677-13).	
RR-0331-3	More traffic also means more air pollution, and more accidents. The two Air Quality Management Areas would remain in Dinting Vale and Tintwistle and more traffic will make it harder to reduce pollution to a level that does not harm human health. Accidents would increase on the wider road network within High Peak especially on the A628T and A57 Snake Pass. At the very least there should be no increase in road collisions but we should be aiming like Greater Manchester for net zero accidents.	Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council in respect of road safety (RR-0240-6) and AQMAs (RR-0240-14 and RR-0240-15).	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0331-4	There will be no relief for Tintwistle which sits either side of the A628 trunk route. The proposed road doesn't bypass the village. Heavy traffic of lorries, noise and pollution will continue to blight residents' lives. With each consultation since 2017 local people have consistently and repeatedly asked for measures to relieve Tintwistle of these impacts. During the 2018 consultation, National Highways reported this as one of 'the key concerns raised during the consultation that we are unable to resolve'. There is no commitment to any other scheme at this time. Tintwistle must not be left to endure the continuing degradation of its environment and residents' wellbeing.	National Highways is a Government company charged with maintaining and improving the Strategic Roads Network (SRN). National Highways is a delivery company for Department for Transport (DfT). National Highways does not determine which projects are to be delivered within the Governments Roads Investment Strategy (RIS) or have responsibility for setting transport policy. Studies into a Mottram, Hollingworth and Tintwistle bypass were carried out over a number of years but this bypass was widely opposed during public consultation and not taken forward. A Department for Transport feasibility study into Trans-Pennine routes, published in 2015, explains the process followed to examine the feasibility of the various options and the decisions made https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports). The study also showed that the most critical issues were in the area of Mottram, which the Scheme aims to address.	RR-0001, RR-0023, RR-0029, RR-0069, RR-0208, RR-0219, RR-0225, RR-0050, RR-0259, RR-0338, RR-0342, RR-0383, RR-0404, RR-0409, RR-0461, RR-0467, RR-0497, RR-0512, RR-0521, RR-0586, RR-0649, RR-0680, RR-0703, RR-0725, RR-0737, RR-0765, RR-0791, RR-0803, RR-0791, RR-0803, RR-0818, RR-0858, RR-0901
RR-0331-5	A solution exists. A ban on through traffic of lorries across the Peak Park, 20s plenty, more space for pedestrians and cyclists, travel planning, and better rail and bus services would address the current situation quickly without road building and give great value for money. The applicant rejected this option without rigorous assessment; it must be properly developed now and implemented."	Please refer to National Highways' response to the Relevant Representation of CPRE Peak District and South Yorkshire (RR-0170-1) with regards to vehicle restrictions. Please refer to National Highways' response to the Relevant Representation of Trans Pennine Trail (RR-0879-1) with regards to improvements for walking and cycling. With the Scheme, bus services will continue to operate along the de-trunked section of the A57 and will not use the new link road. Consequently, bus services will benefit, in terms of both journey times and journey time reliability, from the removal of traffic congestion and delay on the de-trunked section of the A57 due to the Scheme.	



RR-0336 Holme Valley Vision Network

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0336-1	"We object to the scheme for the following reasons: 1. The scheme would increase traffic on the wider network and specifically on the A6024 Holme Moss Road by 14% and on the A628T by 7% (ES Appendix 2.1 page 5). This would increase car dependency, and undermine modal shift to walking, cycling and public transport. This is contrary to national policy. The scheme could also undemine the efforts being made by Kirklees Council to reduce the congestion in the centre of Holmfirth and improve traffic flow.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57, the A628 and to a lesser degree the A6024, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57, A628 and A6024, which means that with the Scheme traffic flows on these roads are forecast to increase. At a policy level, active travel is a matter for the DfT and at a local level by other government organisations. The NN NPS identifies that relying on alternative transport is not a viable way of managing need. In respect of 'modal shift' (public transport, walking and cycling), it is not realistic to rely on these for all journeys.	RR-0085, RR-0131 RR-0203, RR-0259 RR-0336, RR-0467 RR-0760, RR-0842
RR-0336-2	2. Traffic issues in Longdendale are always seen in the context of movement along the A628T corridor between Manchester and Sheffield. The north-south movements are never taken into account. Access from Huddersfield, the Holme and Colne Valleys to Longdendale is particularly problematic due to the traffic on the A6024 Holme Moss road and its junction with the A628T. Traffic also uses the A635 as a way of accessing the M60. Heavy, and in some cases fast, traffic makes the A6024 and B6105 junctions with the A628T dangerous - both roads join the A628T at acute/oblique angles with limited visibility. HGVs also an adverse impact on the centre of Holmfirth and reduces the town centre attractiveness as well as affecting the quality of life of town centre residents.	Only two accidents, one slight and one serious, have been recorded at the junction of the A628 with the A6024 over the five years from 2016 to 2020 inclusive. This indicates that this junction does not present a road safety hazard of particular concern.	
RR-0336-3	3. Increases in traffic are caused in part by vehicles diverting off the M62 (Transport Assessment Report 7.2.13). Diversion of traffic off a motorway onto rural roads is unsustainable, leads to increased accidents and should not be allowed. What routes through West Yorkshire are the diverted vehicles using? Expecting them to divert to the M62 is unrealistic becasue of the additional time and cost taking this long journey would incur. Economics forces HGV onto the rural roads.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57, the A628 and to a lesser degree the A6024, more attractive for drivers that are currently using alternative routes, such as the M62, to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57, A628 and A6024, which means that with the Scheme traffic flows on these roads are forecast to increase.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	
RR-0336-4	4. With increased traffic, as Highways England states, there would be more road accidents (102 extra collisions over 60 years) across the network. Transport Assessment Report Figure 7.8 Spatial Distribution of Safety Impacts shows the highest rate of increase in collisions occurs on the A628T but the A6024 to Holmfirth and the A616 to Huddersfield also have increases. Any increase in collisions is unacceptable. We should be aiming for zero road deaths. Kirklees MBC 2025 Transport Vision is for continuing road casualty reduction. Concern about the risks at the junctions at the Soverign, New Mill and the bottom of Dunford Road in Holmfirth have been expressed for many years but no solutions have yet been found.	Please refer to National Highways' response to the Relevant Representation made by Derbyshire County Council (RR-869-6).	
RR-0336-5	5. Over 60 years of operation the scheme would add an extra 399,867 tonnes of carbon dioxide. Over a lifetime of 100 years, one tree absorbs around 1 tonne of carbon dioxide but we cannot wait for nearly 400,000 trees to grow for a hundred years. Carbon emissions must be tested against international and national legislation and guidance including the Paris Agreement, the 2008 Climate Change Act's legally binding target of net-zero carbon emissions by 2050, the UK Sixth Carbon Budget, science-based carbon budgets from the Tyndall Centre, and the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'.	Please refer to National Highways' response to the Relevant Representation made by CPRE Lancashire, Liverpool and Greater Manchester (RR-0169-1).	RR-0069, RR-0080, RR-0112, RR-0113 RR-0115, RR-0126 RR-0211, RR-0239 RR-0272, RR-0282 RR-0336, RR-0415 RR-0448, RR-0526 RR-0604, RR-0673 RR-0722, RR-0860 RR-0887, RR-0907
RR-0336-6	6. Although there is no road building in the Peak District National Park, the 7% increase in traffic on the A628 through Longdendale would impair amenity for people using trails or exploring open access land. Tranquillity is already eroded. Highways England uses the existing impacts to argue the area is already degraded and to dismiss the impact of increased traffic. Instead it should be seeking to conserve and enhance the National Park."	Please refer to National Highways' response to the Relevant Representation made by Peak District National Park Authority (RR-0677-16).	RR-0058, RR-0112 RR-0133, RR-0203 RR-0206, RR-0211 RR-0334, RR-0478 RR-0579, RR-0697 RR-0713, RR-0722 RR-0750, RR-0818 RR-0860



RR-0485 Keith Buchan

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0485-1	"I am writing to register as an objector to this scheme in somewhat unusual circumstances. I am a Chartered Transport Planning Professional and have some 40 years experience in transport planning. I now spend most of my time working for the Transport Planning Society running their qualifications and professional development scheme. I am currently acting as an expert adviser to the CPRE PDSY. Since March 2021 I have been trying to obtain what I would consider to be basic information from the then Highways Agency, now renamed National Highways. This was for two reasons: first to scrutinise the work supporting the scheme and secondly to help in the finalising of better performing alternatives to the proposed scheme. The scrutiny point is important – in 2007 a scheme was abandoned after serious flaws were found in the modelling. It is important to note that this is a scheme falling within Greater Manchester at one end and the setting of the National Park at the other. It therefore poses complex transport planning problems whose solutions should frame infrastructure proposals, not be led by them. Further details on this will be delivered in the technical report to my client which they intend to submit to you in support of their objection. I am using whatever data I have to hand. To be clear this alternative package includes measures to lower the demand on the network (passenger and freight); to manage traffic through the two corridors so that its impact is reduced; and to support sustainable travel. This is in line with Government policies including the legal acceptance of the Sixth Carbon Budget in June this year and the publication of the DfT Decarbonisation Strategy in July.	National Highways has provided a response to Mr Buchan and Ms Robinson of CPRE Peak District and South Yorkshire (CPRE PD & SY) in an email dated 12 November 2021. In the email, National Highways provided five documents, namely the: • Combined modelling and appraisal report (ComMA) • Transport Modelling Package • Transport Forecasting Package • Economic Appraisal Package (EAP) • Carbon Toolkit National Highways and CPRE PD & SY have been in contact to schedule a meeting in December 2021 to discuss matters raised in their representations.	RR-0069, RR-0126, RR-0167, RR-0240, RR-0312, RR-0336, RR-0338, RR-0355, RR-0433, RR-0461, RR-0466, RR-0623, RR-0803, RR-0818
RR-0485-2	The latter is in line with the Greater Manchester 50-50 vision for local travel which would have a major impact on the forecasts used for the scheme.	The Greater Manchester 50-50 vision forms part of the Transport for Greater Manchester 2040 Transport Strategy to achieve 50% mode split between car and other modes. It is primarily targeted at journeys made within the Greater Manchester area, rather than longer-distanced journeys in and out of Greater Manchester. Consequently, the Greater Manchester 50-50 vision is unlikely to have a significant effect on forecast traffic demand on the A57/A628 Trans-Pennine corridor, and thus, forecast increases in traffic congestion and delay on the A57 between Glossop and Hattersley that the Scheme addresses.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0485-3	The issue of how to deal with forecasting and uncertainty has always been present in WebTAG, but the publication of the DfT Uncertainty Toolkit in May 2021 gives clear further guidance. The uncertainty log provided for this scheme does not comply with this or indeed the earlier guidance.	It is noted that the DfT Uncertainty Toolkit released in May 2021 is still in draft and not formally part of guidance. National Highways requires clarification on which part of the forecasting and assessment is considered non-compliant by the interested party and on what specific further information the interested party requires from National Highways.	
RR-0485-4	A "low" traffic forecast is mentioned but no detail is provided. What concerns me is that there has been a succession of failures to supply basic information and reply to reasonable requests for clarification. It is important to note that a WebTAG compliant appraisal may or may not have been completed – but it has not been supplied. The Transport Assessment (TA) is not the same as an Appraisal (we teach this to our entry level graduates) although the TA supplied appears to refer to one. This is completely unacceptable on many grounds including professional practise and I have started a formal complaint with National Highways on their failure to respond. My specific objection is that insufficient evidence has been presented to the DCO to test compliance with Government policy or guidance. From what has been submitted it would appear that it does not."	Low and optimistic growth sensitivity tests as specified in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) have been conducted, with the Transport Assessment Report [APP-185] summarising the findings for the core central forecast. The Transport Assessment Report has been prepared in accordance with best practice and its content is considered sufficient and appropriate to support this application.	



RR-0620 National Trust

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0620- 1	"Introduction National Trust is a conservation charity with a membership of more than 5 million people. We are legally responsible for the protection of some of the most beautiful and environmentally sensitive places in England. Within the Peak District National Park, we own and manages a wide range of landscapes and their related flora and fauna, from open moorland, limestone gorges, edges and cloughs to enclosed farmland. Much of this land is of international importance for biodiversity and is designated as Sites of Special Scientific Interest, Special Protection Areas, and Special Areas of Conservation. National Trust owns large areas of land on either side of the A57 Snake Pass as it travels through the Peak District. As well as passing through highly designated land, this road is essential to our operation, providing access for National Trust tenants to the land they farm and manage, as well as to their homes. The Snake Pass is a challenging road on which accidents occur, parts of which are also subject to land stability issues. Summary National Trust has concerns about the likely increase in traffic over the A57 Snake Pass through the sensitive environment of the Peak District. We are keen to see measures employed to restrain traffic on the Snake Pass while also reducing environmental impacts and/or delivering biodiversity enhancements.	Pease refer to National Highways' response to the Relevant Representations made by Derbyshire County Council and Peak District National Park. In relation to land stability please refer to National Highways' response to RR-0620-5 below.	RR-0058, RR-0112 RR-0113, RR-0133 RR-0203, RR-0206 RR-0211, RR-0286 RR-0334, RR-0478 RR-0540, RR-0543 RR-0697, RR-0713 RR-0722, RR-0750 RR-0818, RR-0860
RR-0620- 2	Key issues A) We are concerned about the modelled traffic increase on the Snake Pass and associated impacts on the statutory purposes and special qualities of the Peak District, for example impacts on tranquillity, access/recreation and biodiversity.	Pease refer to National Highways' response to the Relevant Representations made by Derbyshire County Council and Peak District National Park. (RR-0240 and RR-0677).	RR-0069, RR-0106, RR-0415, RR-0447, RR-0671, RR-0737, RR-0818-2
RR-0620- 3	B) We are concerned about detrimental effects on the biodiversity of the Peak District as a result of worsening air quality along the Snake Pass, which passes through designated sites. We would wish the applicant to carefully consider and address this issue. We will examine the findings of the Environmental Statement and Habitats Regulations Assessment in relation to these issues.	B) An air quality assessment has been undertaken for the operational phase of the Scheme which has considered the impact of the Scheme on designated sites. The assessment has been undertaken in accordance with latest best practice as set out in the Design Manual for Roads and Bridges LA 105 Air quality standard. A detailed assessment, including air quality modelling, was undertaken for all areas where increases and decreases in traffic flow and congestion are expected to exceed a certain level, including the A57 Snake Pass. The assessment of the air quality impacts of the Scheme at ecological receptors (designated sites) found no significant air quality effects due to the Scheme, including receptors within the internationally designated sites adjacent to the A57, Peak District Moors SPA and South Pennine Moors SAC, which cover large	RR-0115



Response reference	Representation Issue	National Highways Response	Also Applies to
		sections of the Peak District National Park. See Chapter 5 Section 5.9 of the Environmental Statement [APP-061] for further details.	
		Any likely significant effects upon qualifying habitats within the Peak District relating to increases in air quality from the Scheme have also been addressed within the Habitats Regulations Assessment Screening Report (APP-054). Any likely significant effects upon designated sites for nature conservation relating to increases in air quality from the Scheme have been screened out.	
RR-0620-4	C) We are concerned about the modelled increase in accident risk on the Snake Pass.	Please refer to National Highways' response to the Relevant Representation made by Derbyshire County Council (RR-0240-6).	
RR-0620-5	D) This, and ongoing land stability issues, pose a risk to the operations of National Trust staff and tenants.	Maintenance of the highway on the A57 Snake Road is outside the scope of the Scheme and would need to be considered by Derbyshire County Council as the responsible authority for this section of the A57.	
RR-0620-6	E) Mitigation and enhancement We believe that the applicant should be proposing measures to disincentivise cross-park traffic on the A57, and to ameliorate its impacts, for example traffic restraint/technology measures such as tolling/charging, reduction of speed limits or average speed checks, subject to visual impact. Such measures would have multiple interrelated benefits such as: reduced impacts on the National Park, reduced accident rates, improved air quality and a reduction in nitrogen deposition.	There is an existing HGV levy which is a time-based charge that all HGVs at or above 12,000kg must pay for using UK roads. The levy is a time-based charge, which must be paid by the day or multiples of days (by the week, month or year). However, tolls and other forms of road user charging are matters for the UK Government.	RR-0363, RR-0286
RR-0620-7	F) We are keen to see mitigation, compensation and/or environmental enhancement to counter the impacts of the scheme on designated sites. National Trust land adjacent to the Snake Pass may offer a potential receptor site for such measures and we would welcome the opportunity to engage more fully with the applicant.	F) Any likely significant effects upon designated sites for nature conservation from the Scheme (including air quality and nitrogen deposition effects) have been screened out within the Habitats Regulations Assessment Screening Report (APP-054) and within Chapter 8 Biodiversity of the Environmental Statement (APP-064). The design incorporates a number of key mitigation features such as a dedicated bat structure, artificial bat roosts, bird nesting boxes, badger setts, otter-proof fencing, new wildlife corridors and underpasses and planting to create and enhance habitats. Furthermore, the Scheme has been designed to achieve a net gain for area-based habitats and the design has ensured that opportunities to improve biodiversity have been maximised within the permanent land-take within the DCO boundary. The opportunity to discuss off-site enhancement opportunities with the National	
		Trust is welcomed. However, it should be noted that any commitment to these enhancements will sit outside the DCO application.	
RR-0620-8	G) We also wish to see ongoing monitoring of traffic and air quality along the Snake Pass to ensure that the impacts of the scheme are understood, with triggers to implement additional mitigation if necessary."	G) Given that the Scheme will not have any significant adverse effects on air quality during operation, no air quality monitoring within the designated sites is considered to be required.	
		Traffic will continue to be monitored by the existing Department for Transport fixed count point on the A57 Snake Road.	



RR-0640 Norwich and Norfolk Friends of the Earth

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0640-1	"I wish to explain in detail the amount of carbon emissions resulting from the construction of the road/s and during it's lifetime, and that such plans could be illegal to put into place because they contravene the 2015 Paris Climate Agreement which the UK Govt signed up to. There are also issue to be explored concerning the increase of toxic fumes into the atmosphere and damage to the living environment"	The Environmental Statement considers the impact on the ability of the UK Government to meet its legislated targets, including all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965MtCO ₂ e, which was adopted by the Government and was due to pass into law at the time in which the Environment Statement was being prepared. Chapter 14: Climate of the ES (APP-070)_reported with this policy in view and explained the impact of the Scheme on Government's ability to meet its legislated carbon reduction targets. Please refer to National Highways' response to the Relevant Representation made by the Peak District National Park Authority for further details. An air quality assessment for the Scheme has been undertaken in accordance with latest best practice as set out in the Design Manual for Roads and Bridges standard. (DMRB LA 105) The pollutants (referred to as 'fumes' in representation) considered in the air quality assessment of the Scheme are nitrogen dioxide (NO ₂) and particulate matter (PM), as these are the pollutants of most concern in relation to road traffic emissions in England. A detailed assessment, including air quality modelling has been undertaken for all areas where increases and decreases in traffic flow and congestion are expected to exceed a certain level. The air quality impacts of the Scheme were assessed considering both human health (such as houses) and ecological receptors (habitats within designated sites). The modelling has focused annual mean nitrogen dioxide (NO ₂) as this is the pollutant for which there are current exceedances of government Air Quality Strategy (AQS) objectives. As set out in Chapter 5: Air Quality of the ES (APP-061) the assessment found that on balance the Scheme is expected to result in an overall improvement in local air quality for human health receptors (such as houses), with decreases in concentrations such that there is a reduction in the extent of areas wher	RR-0206, RR-0715, RR- 0870



RR-0751 Robert Hodgetts Haley on behalf of High Peak Green Party

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0751-1	"If the purpose of the proposed new road is to resolve the longstanding problems of traffic congestion and air pollution in Glossopdale and Tameside, it fails. 1. Projections for the proposal indicate substantial increases in traffic and related emissions on the A57 Brookfield (31%), A57 Snake Pass (38%), on minor roads - New Road Tintwistle (50%), Norfolk Rd (21%) and Dinting Rd (45%), and small but significant increases on the A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd. All these roads have households living adjacent to them and Dinting Road has a school.	The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP–185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road. However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys. The Scheme is forecast to result in an increase in traffic on Dinting Road and Shaw Lane. This route is currently a well-known and well-used alternative to the A57 through Glossop. This is because of traffic congestion and delays on Glossop High Street at certain times of day. The scheme itself is not introducing any specific measures on this part of the network that would modify this traffic flow are forecast to be relatively low at up to 91 vehicles per hour on Dinting Road due to the Scheme is up to 1,600 vehicles per day (+50%) and on Shaw Lane it is up to 1,000 vehicles per day (+	RR-0372



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0751-3	3. This comes at a cost of £228 million, not so much less than the £257 million, allocated in 2021-2022 to walking and cycling schemes in the whole of England. Economic benefits to local people would be better delivered by improved access to safe walking and cycling, and by better public transport options.	 We're creating new and improved facilities for walkers, cyclists and horse riders throughout the route, including: Improved pedestrian and cyclist crossing facilities at the M67 junction 4, and all new junctions created by the scheme Crossing at the Mottram Moor junction will now be quicker and easier with the new crossroads design. We're also adding more cycling and pedestrian crossings Replacement connections for the existing footpaths severed by the scheme A bridleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans-Pennine Trail (National Cycle Network route 62) A new equestrian crossing on the new bridleway to the west of the Mottram Moor Junction will connect the A57 Link Road bridleway up to another new bridleway that continues to Old Hall Lane. Improved pedestrian crossing facilities at the existing Gun Inn Junction with a pedestrian phase in the signal sequence. Two new traffic islands at the Woolley Bridge junction, to make it more efficient for both pedestrians and drivers. We're continuing to work with Local Authorities to improve connections on the existing A57 route 	RR-0400
RR-0751-4	4. The increase in traffic is also projected to provoke a substantial increase in traffic accidents in an area that already has significant risks.	Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council (RR-0240-6).	
RR-0751-5	5. Constructing the new road will emit at least 38,970 tCO2e and the new road, when in use, would emit an extra 116,332tCO2e between 2023-37; over the 60-year assessment period, the scheme would add an extra 399, 867tCO2e. These figures apparently allow for electric vehicles in the traffic modelling. Though small, these amounts are heading in the wrong direction and undermine government's legal duty to reduce emissions by 78% by 2035, as set out in the 6th carbon budge, and to reach net zero by 2050.	Please see the response by National Highways to the Relevant Representation made by the Peak District National park authority in respect of carbon (RR-0677-13). Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council in respect of fleet assumptions (RR-0240-22).	RR-0080, RR-0472, RR-0571
RR-0751-6	 Road building can't provide a long-term solution to traffic problems, but this scheme doesn't appear to provide much short-term relief either. No lasting solution will be found without a strategy to reduce demand for road use. Such a strategy should include: Reversing of the centralisation of facilities and services that has degraded many communities Ensuring that local facilities and services can be reached safely on foot and by bike. Providing reliable, regular, affordable and integrated public transport Reducing the need for many journeys by the use of telecommunications. Reducing commuting by private car by ensuring that workplaces can be 	Please see the response by National Highways to the Relevant Representation made by Sharefirst my journey to school (RR-0796-4). At a policy level, active travel is a matter for the DfT and at a local level by other government organisations. The NN NPS identifies that relying on alternative transport is not a viable way of managing need. In respect of 'modal shift' (public transport, walking and cycling), it is not realistic to rely on these for all journeys. Please see National Highways' response to the Relevant Representation made by the CPRE Peak District & South Yorkshire in respect of modal shifts to walking, cycling and public transport, and NN NPS (RR-0170). The Scheme is in line with the government commitment to provide people with options to choose alternative modes of transport and making door-to-door	



Response reference	Representation Issue	National Highways Response	Also Applies to
	 reached by public transport or by company-provided transport Encouraging a large-scale transfer of freight to rail. Active management of delivery by road o load sharing and return loads. o local authorities to set the weight limits appropriate for their roads. o Local authorities to determine times when deliveries can be made. Such a strategy may seem to require too much change, but reacting to everincreasing demand by building more roads is not sustainable, especially considering the climate and ecological emergencies we are facing 	journeys by alternative means an attractive and convenient option. This is in accordance with wider transport strategy locally and nationally. We support improvement of walking, cycling, and horse riding routes, as well as improvements to public transport. The Scheme will improve local walking, riding and horse riding routes in the area and we are working with Local Authorities and local interest groups to ensure this is done the right way, as well as Transport for Greater Manchester and Transport for the North.	
R-468 - 7	In addition to the effects on traffic, pollution and carbon emissions, an area prized for its natural beauty will urbanised, reducing access to nature that has proved so important during the pandemic. Wildlife corridors will be disrupted at a time when we should be seeing efforts to reverse the fragmentation of habitats."	The ES Chapter 7, Landscape and Visual Effects [APP/063] sets out the key characteristics of the landscape character and also sets out the Special Landscape Qualities of the Peak District National Park (PDNP) many of which contribute to natural beauty. Figure 7.3 shows the breakdown of the Scheme Level Landscape Character Areas (SLLCAs) and Scheme Level Townscape Character Areas (SLTCAs) and the distribution of the more built-up areas from the more rural areas. These are then considered in the assessment of change on the landscape. Residual Effects are those remaining after mitigation has been implemented. These are detailed within Section 7.9 Assessment of Effects and Appendix 7.1 (APP-166). As a result of mitigation commitments, there are no significant residual effects on landscape and townscape character areas as a result of the Scheme.	
		Chapter 5: Air quality of ES [APP-061], presents the air quality assessment for the Scheme, undertaken in line with the latest best practice guidance as set out in National Highways Design Manual for Roads and Bridges (DMRB) LA 105 air quality standard. Results of the assessment show that the Scheme will lead to an overall improvement in local air quality, decreasing and/or removing the exceedances of government Air Quality Strategy (AQS) objectives for annual mean NO2 in some areas where they are currently exceeded within the study area and are expected to the exceed in the opening year of the Scheme (2025) without the Scheme in place. It should be noted that the traffic model accounts for the traffic growth expected in the Scheme opening year (prior the construction of the Scheme) as a result of the committed developments within the area, therefore the Scheme will relieve the consequent level of congestion. Please see the response by National Highways to the Relevant Representation made by Friends of the Earth England, Wales and Northern Ireland in respect of wildlife corridors and fragmentation of habitats (RR-0281-4).	



RR-0796 Sharefirst My Journey to School

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0796-1	"• What measures are in place to reduce predicted accidents increases?	The Scheme has been designed in accordance with the relevant highway design standards. These design standards are formulated to ensure that new or improved highway schemes minimise the risk of road traffic accidents.	
RR-0796-2	• More detail on design widths of multi-user paths would be welcome, especially if bi-directional and shared by various non-motorised users including equestrian users. Traffic overtaking horses on the off-side, passing close by or close to the local speed limit, for example HGVs and buses, can pose a particular hazard for horses and equestrian users. How will segregated paths encourage 'passing wide and slow'? Raising awareness through signage and inclusion of training in the scheme could help reduce accidents.	The multiuser paths will be designed in accordance with the relevant national design standards. This includes segregated provision where required and sufficient space for users to pass safely. A key safety feature will be segregating facilities from adjacent highway where sufficient space is available. NMU facilities will also be designed with good visibility to ensure any issues will be minimised. There will also be a system of fingerpost signing to guide users safely through the proposals.	
RR-0796-3	We'd like to study junction detail at the Gun Inn regarding suitability for equestrian users and onward connection to the Coach Road Bridleway.	Due to the lack of available space within the existing highway at Gun Inn junction there is no room to provide equestrian crossings at this location. The highway environment on the existing A57 will be improved for equestrian usage with a reduction to one lane of traffic along Mottram Moor but no formal equestrian facilities are proposed.	
RR-0796-4	 The A57 link road will move the congestion from Mottram Moor; however will this open the floodgate to traffic using the route through Hollingworth, Tintwistle and onto the A628 Woodhead Pass? You can see there have been improvements to the A628 for example the stretch of road alongside the Dog and Partridge Pub, and also improvements already in place to connect to the M1 motorway. As far as we can see there are no plans for Hollingworth, Tintwistle and Crowden on the A628. What is the forward plan for continued investment in sustainable travel choices in the region? 	The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP-185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road. However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	RR-0069, RR-0096 RR-0112, RR-0121 RR-0167, RR-0186 RR-0219, RR-0295 RR-0453, RR-0196 RR-0318, RR-0324 RR-0335, RR-0345 RR-0346, RR-0359 RR-0366, RR-0397 RR-0447, RR-0449 RR-0478, RR-0523 RR-0579, RR-0580 RR-0667, RR-0671 RR-0713, RR-0721 RR-0722, RR-0739 RR-0762, RR-0795 RR-0798, RR-0852 RR-0870, RR-0906



Response reference	Representation Issue	National Highways Response	Also Applies to
		National Highways is a Government company charged with maintaining and improving the Strategic Roads Network (SRN). National Highways is a delivery company for Department for Transport (DfT). National Highways does not determine which projects are to be delivered within the Government's Roads Investment Strategy (RIS) or have responsibility for setting transport policy.	
		Studies into a Mottram, Hollingworth and Tintwistle bypass were carried out over a number of years but this bypass was widely opposed during public consultation and not taken forward. A Department for Transport feasibility study into Trans-Pennine routes, published in 2015, explains the process followed to examine the feasibility of the various options and the decisions made ⁴ . The study also showed that the most critical issues were in the area of Mottram, which the Scheme aims to address.	
		The Scheme is in line with the government commitment to provide people with options to choose alternative modes of transport and making door-to-door journeys by alternative means an attractive and convenient option. This is in accordance with wider transport strategy locally and nationally. We support improvement of walking, cycling, and horse riding routes, as well as improvements to public transport. The Scheme will improve local walking, riding and horse riding routes in the area and we are working with Local Authorities and local interest groups as well as Transport for Greater Manchester and Transport for the North.	
RR-0796-5	• The road proposal continues to pass close to Hollingworth Primary School and residential areas of Hollingworth, Tintwistle and Cowden. How will current congestion, air quality, safe crossing and safe journeys away from the road be improved?	The Scheme will create better conditions for pedestrians and cyclists in Mottram in Longdendale, reduce congestion and delays affecting residents and businesses in the area and help public transport to be more reliable where it currently gets delayed.	
		The Scheme is expected to result in an overall improvement in local air quality for human health receptors (such as houses). There are also not expected to be any significant adverse effects with the scheme for human health receptors or designated ecological sites.	
		The air quality study area has been defined in accordance with latest best practice as set out in National Highways Design Manual for Roads and Bridges (DMRB) LA 105 air quality standard. Both nitrogen dioxide (NO ₂) and particulate matter (PM) were considered in the air quality assessment for the Scheme. A detailed assessment, including air quality modelling has been undertaken for all areas where increases and decreases in traffic flow and congestion are expected to exceed a certain level. The modelling focused on annual mean nitrogen dioxide (NO ₂) as this is the pollutant for which there are current exceedances of government Air Quality Strategy (AQS) objectives.	

 $[\]underline{\ ^4 \ \text{https://www.gov.uk/government/publications/trans-pennine-routes-feasibility-study-technical-reports}}$

Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/EXAM/9.5



Response reference	Representation Issue	National Highways Response	Also Applies to
		The DMRB LA 105 guidance defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1). The traffic change criteria were applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A628 through Hollingworth, Tintwistle and Crowden. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP-076).	
		The traffic change due to the Scheme along the A628 through Hollingworth meets the screening criteria between the Junction with Woolley Lane and New Road and has been included in the air quality modelling presented in Chapter 5 Air Quality of the ES (APP-061). The criteria are not met on the A628 to the north of this through Tintwistle and Crowden, therefore receptors at these locations have not been included within the air quality assessment. Where traffic change criteria are not exceeded this indicates that there would not be a significant effect on air quality due to the Scheme in these locations.	
		Receptors in Hollingworth located adjacent to the A628 between Woolley Lane and Taylor Street are expected to have an improvement in air quality with the scheme. The Hollingworth Primary School is adjacent to this section of A628, however, it was not assessed explicitly as a discreet sensitive receptor in the air quality assessment due to its position set back from the road. Results at sensitive receptors adjacent to the A628 between Taylor Street and New Road show no exceedances of the annual mean NO ₂ AQS objective in the Scheme opening year (2025), with or without the Scheme and changes in concentrations due to the Scheme do not have a significant adverse effect at these locations.	
		It will be safer for pedestrians and cyclists as we are greatly reducing the potential for interaction between pedestrians and cyclists as part of this scheme. The new bypass will take traffic away from the centre of Mottram therefore reducing the chance of pedestrians being in close contact with vehicles. In addition, there will either be an overbridge or an underpass for pedestrians/cyclists for any severed routes ensuring no unsafe crossing of the road is required.	
		Our traffic assessment shows the scheme reducing accidents across the local area, because traffic will be moved onto more modern roads, with up to date specifications. The scheme also includes enhanced pedestrian facilities at each junction along the route, which will improve pedestrian safety.	
		Improved pedestrian crossing facilities at the existing Gun Inn Junction due to the Scheme include a pedestrian phase in the signal sequence which should improve safety for pedestrians using the crossing.	
		New and improved facilities for walkers, cyclists and horse riders elsewhere, include:	



Response reference	Representation Issue	National Highways Response	Also Applies to
		 Improved pedestrian and cyclist crossing facilities at the M67 junction 4, and all new junctions created by the scheme 	
		 Crossing at the Mottram Moor junction will now be quicker and easier with the new crossroads design. We're also adding more cycling and pedestrian crossings 	
		 Replacement connections for the existing footpaths severed by the scheme 	
		 A bridleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans-Pennine Trail (National Cycle Network route 62) 	
		 A new equestrian crossing on the new bridleway to the west of the Mottram Moor Junction will connect the A57 Link Road bridleway up to another new bridleway that continues to Old Hall Lane. 	
		 Two new traffic islands at the Woolley Bridge junction, to make it more efficient for both pedestrians and drivers. 	
		 We're continuing to work with Local Authorities to improve connections on the existing A57 route 	
RR-0796-6	• The road layout is unchanged at Dinting (AQMA zone) with current persistent high NO2 exceedences close to Dinting Primary School, Air pollution, particularly NO2, PM10 and PM2.5 adversely impacts respiratory health and	The scheme specific traffic model includes strategic roads, including the A57 through Dinting and Glossop. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP-076).	
	mental health, and traffic modelling for Dinting indicates projected traffic increases with additional HGV load from Glossop Spur road. Given the important artery through Brookfield, Gamesley, Dinting into Glossop and onward to Snake Pass, should the DCO boundary be revised to include Dinting?	The traffic change criteria are not exceeded for the A57 between the Dinting Vale junction with the A626 Glossop Road and the junction with Ellison Street in central Glossop, which includes the section of the A57 adjacent to Dinting School. Sensitive receptors located outside the air quality study area (as defined by the ARN), such as Dinting School, have not been included in the air quality assessment as there would not be a significant adverse effect due to the Scheme at these locations.	
		It should be noted, that results at sensitive receptors adjacent to the A57 south of Dinting Vale junction (within 200m of the junction) have been included in the air quality assessment and are presented in Chapter 5: Air quality of the Environmental Statement (APP-061). These receptors show no exceedances of the annual mean NO ₂ AQS objective in the Scheme opening year (2025), with or without the Scheme and changes in concentrations due to the Scheme do not have a significant adverse effect at these locations.	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Chapter 12: Population and Human Health of the ES (APP-068) identifies vulnerable groups beyond the DCO boundary to cover a wider study area. This is achieved from a review of the population and human health baseline for Tameside and High Peak Local Authorities as a whole, as well as data from within these areas (e.g. Ward level data and Lower Super Output Areas) and is reported in Table 12.13 of the ES. In doing so, the assessment captures any significant population and human health effects resulting from the Scheme, including those on physical and mental health and social wellbeing. The assessment considers the sensitivity of the identified wider and vulnerable groups (including children and adolescents) to health determinants, including air quality. In respect of air quality, the assessment reports a Negative Health Outcome during (and limited to) construction and a Positive Health Outcome during operation.	
RR-0796-7	How will A57 link road proposals integrate into the Local Plan review underway?	Work to replace the Tameside UDP with the Tameside Local Plan is ongoing and aims to align Tameside MBC (TMBC) specific policies with those being prepared at a regional level. An Issues and Options report (first draft) is anticipated in Autumn 2021 for consultation, however this is subject to change pending the timescales associated with the production of the new development plan document for Greater Manchester, "Places for Everyone". Adoption of the Tameside Local Plan is currently anticipated to be in winter 2024. The saved policies of the Tameside UDP are therefore the primary local development plan document for the Scheme given it is located mostly within the TMBC area. The UDP provides a specific policy T2: Trunk Road Developments, which safeguards the route proposed for the Scheme.	
RR-0796-8	How can local, regional and national government better collaborate towards long term funding to strengthen strategic planning in sustainable travel by TMBC, DCC, HPBC and TfGM and unlock regional investment?	National Highways has now commenced its next round of route strategies. Route strategies are one of the key steps of initial research in the development of the Road Investment Strategy (RIS). This is a rolling programme that sets our plan for the strategic road network (SRN) and determines how we secure investment for the work we need to do. This round of route strategies will inform the investment plans for RIS 3 (2025 to 2030) and beyond. Our approach is outlined in our publication of 'Vision for Route Strategies – Planning for the future of our roads'.	
		We are now in the engagement phase to inform the evidence base and have launched an online feedback tool to capture the views of road users, communities and interested parties on their needs for the Strategic Road Network.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0796-9	What is driving the predicted increases in traffic volumes at Hattersley / M67 J3-4(1), Dinting(7), A57 Sheffield Road(28) Hollingworth(10), A628 Crowden-Woodhead(23-26)? Are the decreases in traffic at Woolley Bridge realistic(20)? What is driving the predicted increases in traffic volumes at Hattersley / M67 J3-4(1), Dinting(7), A57 Sheffield Road(28) Hollingworth(10), A628 Crowden-Woodhead(23-26)? Are the decreases in traffic at Woolley Bridge realistic(20)?	The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP-185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road. However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys. The Scheme is forecast to result in an increase in traffic on Dinting Road and Shaw Lane. This route is currently a well-known and well-used alternative to the A57 through Glossop. This is because of traffic congestion and delays on Glossop High Street at certain times of day. The scheme itself is not introducing any specific measures on this part of the network that would modify this traffic behaviour. The resulting forecast increase in traffic by 2040 on	
		Dinting Road due to the Scheme is up to 1,600 vehicles per day (+50%) and on Shaw Lane it is up to 1,000 vehicles per day (+14%.) However, the absolute increases in traffic flow are forecast to be relatively low at up to 91 vehicles per hour (less than 1 vehicle per minute each way) on Shaw Lane and up to 159 per hour on Dinting Road (less than 1 vehicle every 45 seconds each way).	
		This part of the road network is outside of the Scheme boundary and it is, therefore, a matter for Derbyshire County Council to address issues of traffic using alternative roads to avoid traffic congestion on Glossop High Street.	
	The Scheme effectively provides a by-pass for the A57 through Wooley Bridge. It also incorporates traffic calming on the de-trunked section of the A57 through Wooley Bridge and Mottram that will encourage through traffic to use the new link road instead of the de-trunked section of the A57. Consequently, the forecast reduction in traffic flow on the A57 through Woolley Bridge due to the Scheme is realistic.		



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0796-10	• The traffic modelling is based on data collected in 2015 with an additional range of recent surveys. Does the methodology fairly represent travel impacts from the pandemic, for effective junction operation and signalling solutions at Hattersley, Hollingworth, A628, Glossop Spur Road, Dinting and responsive train and bus services?	The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and is based on the DfT's National Trip End Model (NTEM). The latest version of which predates the Covid-19 pandemic. National Highways recognises that the Covid-19 pandemic has, to date, had a significant effect on the people's travel patterns and traffic volumes using the road network. However, it is too early to know what the long-term impacts of the Covid-19 pandemic will be on people's travel patterns and particularly on forecast traffic growth. Until there is evidence of the likely longer-term impacts of the pandemic on peoples travel patterns that will enable revised traffic forecasts to be derived with some certainty, National Highways can only rely on the established method of forecasting traffic growth for the assessment of the Scheme that predates the Covid-19 pandemic. However, as set out in the Case for the Scheme (APP-182), the Scheme Appraisal does take account of lower forecast economic growth due to Covid-19.	
RR-0796-11	How will habitats for notable and protected species be monitored for sensitive mitigations once works have commenced?	Monitoring requirements to be implemented during and after the construction phase of the Scheme will be outlined in the Environmental Management Plan (EMP). The EMP has been prepared in line with the Design Manuel for Roads and Bridges (DMRB) LA 120 (Environmental Management Plans) and will be subject to approval by the Secretary of State in accordance with DCO Requirement 4. Please refer to the outline Environmental Management Plan (APP-183) and Register of Environmental Actions and Commitments (APP-184) for further details on monitoring commitments.	
RR-0796-12	When will assessment of Clean Air Zone for users of A628 / A57 be available?	National Highways is engaging with Transport for Greater Manchester with regard to the potential impacts of the Clean Air Zone on the Scheme and vice versa.	
RR-0796-13	What is status of national discussions regarding increasing size of HGVs?"	National discussions and consultations related to increasing the size of HGVs would be dealt with by the Department for Transport rather National Highways as this would be a matter of Government policy.	



RR-0800 Sheffield Climate Alliance

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0800-1	"Introduction We are commenting on this proposed scheme because it would increase greenhouse gas emissions during a climate emergency. Since the scheme was proposed in 2018, stronger local and national climate targets have been set, which the scheme could not reasonably align with. How transport projects are assessed against climate targets. Using this guideline alone is extremely inappropriate since it is clearly that a road project will, in isolation, affect our ability to meet national carbon targets. Using this guideline alone is extremely inappropriate since it is clearly the cumulative impact of all road capacity that can endanger carbon targets. The fact that surface transport emissions have barely reduced in 25 years shows a more rigorous approach is long overdue. Meanwhile, TfN is currently carrying out analytical work for all northern transport. This has already shown that its current investment programme will not fit with newly tightened national climate targets. This should prompt all schemes to be examined more critically. Emissions associated with the scheme We compare these to the most appropriate notional transport carbon budget for the area. Tameside's is the best comparator as it covers most (though not all) of the area of the scheme. Note that Tameside Council declared a Climate Emergency in February 2020 and committed to align with Greater Manchester ambitions to become net zero by 2038. Projected emissions are stated in paragraph 14.13.1 of Highways England's Environmental Statement. The total construction and operational emissions are 84 484 tCO2e from 2023 until 2032. Here, we will consider the period from the roads' opening in 2025 to the end of the fifth carbon budget, at the end of 2032. For simplicity, we will account for all the construction emissions within that period. Whilst technically inaccurate, this gives a less complex comparison than if the construction emissions are accounted for before the roads become operational. The evidence base behind Tameside's climate targets is	The Scheme has considered the relevant legislation in Chapter 14: Climate of the Environment Statement (APP-070). These include especially: 1. National Policy Statement - National Networks: Paragraph 5.17 states that applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets. While noting that 'it is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet the targets of its carbon reduction target plan', Paragraph 5.18 goes on to state that development consent should be refused if a scheme would have a material impact on the Government reaching its reduction targets. 2. Climate Change Act (2008) as amended in 2019: The chapter considers all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965MtCO2e, which was adopted by the Government and was due to pass into law at the time in which the Environment Statement was being prepared. The ES Climate Chapter reported with this policy in view and explained the impact of the Scheme on Government's ability to meet its legislated carbon reduction targets. In addition, the assessment undertaken was compliant with the relevant sections of the Design Manual for Roads and Bridges (DMRB) LA 105 and DMRB LA 114. Local Carbon Budgets as defined by local or regional bodies are not defined in the relevant National Policy Statement for National Networks, nor in the Climate Change Act or any dependent legislation. These are not therefore considered to have legal force when it comes to examining the suitability of the Scheme for its impact on ability to reduce carbon emissions. The DMRB (LA 114, para. 3.9) advises that the study area for road user GHG emissions should be consistent with the Affected Road Network for a proposed Scheme. It further requires (para 3.18) that assessment is taken against UK Government carbon budgets and laid out as has been done in	



Response reference	Representation Issue	National Highways Response	Also Applies to
	Conclusions We believe that in view of the climate emergency, all investment decisions need to fit with climate objectives. We urge that this link roads scheme proposal be rejected and consultations carried out on more sustainable	The Committee on Climate Change (CCC)'s 2019 report 'Net Zero: The UK's contribution to stopping global warming' reassessed the UK's long-term emissions targets and pathways for achieving these, and formed the basis of the Government's Net Zero amendment to the Climate Change Act.	
	transport solutions."	The main pathway element recommended by the CCC for transport and transport infrastructure is electrification of the national fleet. This will require a fit-for-purpose road network with adequate capacity. The CCC's 'core' and 'further ambition' scenarios both include an element of modal shift to non-road transport. However, road transport remains the central focus of policy and will continue to require appropriate infrastructure. It is noted in the CCC report that reaching net-zero emissions will require the development or enhancement of shared infrastructure to enable many of the actions which are required. Although infrastructure development will generate some GHG emissions, it is not precluded but encouraged in the right instances by the CCC. This is supported by the NPS NN which states that generation of emissions is in itself not a reason to refuse development consent, particularly when the magnitude of these emissions is small in comparison with the reductions which will be generated by improvements such as electrification of the fleet.	
		Consideration should be given to whether a scheme would materially affect the ability of the Government to meet its carbon reduction targets. The NPS NN clearly demonstrates that this is unlikely for a road improvement scheme, as all projects of this type (in total) amount to less than 0.1% of UK carbon budgets per year. DMRB LA 114 also notes this stance in its guidance.	
		With regard to the ongoing Transport for the North (TfN) analysis quoted, National Highways is unable to provide further comment as the analysis has not been published.	



RR-0801 Sheffield Green Party

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0801-1	We believe that a reduction in road transport and radical moves towards a transport network based largely on public transport is essential to meet the challenges of air pollution and climate change. Therefore, all new road expansion proposals need to be examined carefully, at a time when travel habits and policy are rapidly changing		
RR-0801-2	Heavy traffic through Mottram has long been an issue. The link roads are designed partly to relieve this but would push the most serious congestion further east. Tintwistle and Glossop, particularly Dinting Vale, already have almost continuous day-time congestion which is largely independent of the Mottram congestion, but worsened by the latter. Given that new roads nearly always attract greater volumes of traffic, we should assume those areas will suffer even more.	Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council (RR-0240-15).	
RR-0801-3	Yet there is a much more serious and wider issue that is not being addressed. This is to urgently reduce greenhouse gas emissions to address the climate emergency that Parliament and local authorities across the country have recognised. In October 2019, High Peak Council declared a Climate Emergency and "pledged to work towards a carbon neutral High Peak by 2030". In November 2019, Derbyshire County Council pledged to become carbon neutral by 2032. In February 2020, Tameside Council declared a Climate Emergency and is now committed to become 'carbon neutral' by 2042 with 13.1% year on year reductions in climate emissions. The link road proposals should be assessed against these ambitions.	Please see the response by National Highways to the Relevant Representation made by the Peak District National Park Authority (RR-0677-13). Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council (RR-0240-20) and Climate Emergency Planning and Policy (RR-0161).	RR-0338, RR-0433, RR-0623
	However, the Government's own official climate advisory body, the CCC, has repeatedly warned that current policies will not put the UK on a path towards meeting the legally binding Climate Change Act. Its recent recommendations for more rapid emissions reductions (by 68% rather than 61% by 2030) have been accepted. The Government clearly accepts the need for more rapid action but there is still a wide gap between the targets and the policies designed to meet them.		
	We therefore believe it appropriate to compare the stated impacts of the scheme to the Tameside Council climate ambitions, which are supported by recent robust evidence. [https://carbonbudget.manchester.ac.uk/reports/E08000008/]		



Response reference	Representation Issue	National Highways Response
	This Tyndall Centre report shows that Tameside has a carbon budget of 4.57 MtCO2e for the period 2025-2032 [see Figure 1]. If the proportion of this for surface transport is 27%, as it is nationally [PEIR 14.4.1], this would be 1.23 MtCO2e. If the construction emissions are accounted for evenly between 2025 and 2032 and in the transport sector, total emissions from the scheme up to the end of 2032 (the end of the national Fifth Carbon Budget period) would be 84884t. This represents 7% of Tameside's notional transport carbon budget. For just two link roads, that is clearly a disproportionate share of the total emissions targets for an entire Local Authority area. The various authorities in the area need to develop a transport strategy which recognises how quickly greenhouse gas emissions must be reduced. It would also bring air quality within legal limits. These new link roads cannot reasonably fit with any such plan. New road building will have to be minimised, in common with everywhere else in the UK. Authorities and their partners in both Manchester and Sheffield are developing transport strategies that involve substantial reductions in road traffic. These involve a much greater emphasis on providing facilities local to where people live, active travel and public transport. These plans would be hampered by increased road traffic between the two cities.	
RR-0801-4	The tranquillity of the Peak District National Park in between them would also be clearly harmed. We urge that this scheme be rejected."	Please refer to National Highways' response to the Relevant Representation made by the Peak District National Park Authority (RR-0677-10) in relation to tranquillity.



RR-0877 Udo Pope on behalf of Peak and Northern Footpaths Society

Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0877-1	"PNFS objects to the A57 Link Roads Scheme for the following reasons: 1. The adverse effect that the Scheme would have on users of the six footpaths that would be partially stopped up and diverted by the Scheme, both in terms of its effect on the views from those footpaths and the change to the character of those footpaths. In particular, the generally quiet and rural nature of those footpaths will be irretrievably changed.	No footpaths would be permanently stopped up, however during the construction phase some footpaths within the DCO boundary will be diverted, resulting in temporary disruption to access, throughfare and connectivity. As set out in ES Chapter 7 Landscape and Visual Effects [APP-063], these are PRoW 32, 50, 51, 52, 87, 88 and 90. Of these, footpaths 51, 52 and 90 will have a temporary significant effect (moderate adverse) after mitigation. ES Appendix 7.1 - Visual Effects Schedule [APP-166] sets out a the receptors (users of footpaths) who will experience change to the existing baseline. Users of these footpaths will experience a significant change. For PRoW 51 and 52 this is due to it being diverted as it is severed by the Scheme resulting in effects on footpath users during construction and operational phases. From the diverted route there will be close range views of the highway, noise barriers, Old Mill Farm underpass and traffic set behind new mitigation planting. More distant views of the Scheme alignment in the pastoral landscape will be available including towards the western Mottram underpass approach at Roe Cross Road. Over time, proposed mitigation planting commitments set out in ES Chapter 7, Table 7.25 (roadside woodland, native shrub planting, banks and ditches and hedgerows) will soften the appearance of the Scheme and its associated features. Therefor the large adverse effects anticipated during construction would reduce to moderate adverse by the opening year, after mitigation. For PRoW 90 a significant effect was reported for both the construction and operational phases. This route will be diverted as it is severed by the Scheme. During construction the vicinity of the Scheme will experience increased activities, including the construction of the new bridge over the River Etherow. In the operational phase, there will be close range views from the diverted route of the highway and the new underpass structure, which will be flanked by mitigation planting, noise barriers, and a new bridge over the	RR-0069



Response reference	Representation Issue	National Highways Response	Also Applies to
		permanent change to views as a result of the Scheme implementation and Operation. However, following establishment of mitigation planting at year 15 the Scheme will be somewhat integrated, therefore the effect is reduced to Moderate Adverse.	
RR-0877-2	2. In most cases walkers on those six footpaths would be required to pass through underpasses likely to be perceived as ugly and intimidating. PNFS would prefer appropriate footbridges to be provided closer to the current routes of those footpaths, as requested by PNFS during the consultation carried out in November/December 2020.	The underpasses at Carrhouse Lane and Old Mill Farm will help to maintain farm access and provide a safe route for walkers, cyclists and horse riders. The link road at Carrhouse Lane is raised on an embankment, so a footbridge at this height would have a significant impact on the landscape. An underpass and diversion of a few meters was considered more appropriate. The route of the underpass at Old Mill Farm will only divert the walkers and cyclists by a few hundred metres. A footbridge over the highway along the current alignment of PRoW LON/50 cannot be delivered because of the presence of overhead power lines. The underpasses are being designed in accordance with government guidance on inclusive mobility, meaning they will be accessible to all users. They will be well lit to discourage anti-social behaviour.	
RR-0877-3	3. The adverse effect of the Scheme on the views from other footpaths in the vicinity of the Scheme, for example the views in an Easterly direction from footpath number 93 in Longdendale and the views in a South Westerly direction from bridleway number 108, also in Longdendale.	Footpath LON/93 was represented by viewpoint V-P-10-LON/93 in ES Appendix 7.1 - Visual Effects Schedule [APP-166]. The assessment found that in midrange views the Mottram Moor junction would be partially visible, though the Scheme will be partially screened by the earthworks associated with that junction so that during the construction period and in the winter of year one a moderate adverse effect was anticipated. However, with mitigation commitments, in particular roadside woodland planting, the effect was anticipated to reduce to slight adverse by the summer of year 15.	
		Footpath LON/108 was represented by two viewpoints V-P-05 -LON/108 and V-P-05-1 LON/108 in ES Appendix 7.1 - Visual Effects Schedule [APP-166]. The assessment found that from the former (V-P-05), lying approximately 235m from the Scheme, there was no discernible change likely to be seen due to intervening built form and vegetation and therefore neutral at both construction and operation.	
		For V-P-05-1 LON/108, lying approx.190m from the Scheme, there was an anticipated large adverse effect during construction due to earthworks, the introduction of the Mottram junction and associated reduction of vegetation. At the opening year – winter of year one, there was found to be a likely significant effect of moderate adverse due to the opening up of views following vegetation reduction which would include road signage. Mitigation commitments including planting were considered, on establishment, to provide screening so that the effect at the summer of year 15 was slight adverse.	



Response reference	Representation Issue	National Highways Response	Also Applies to
RR-0877-4	4. The increased traffic noise that is likely to be audible to people walking on the six diverted footpaths, as well as other footpaths in the immediate vicinity of the Scheme.	It is agreed that the road traffic noise levels on the footpaths close to the new roads introduced by the Scheme would be perceptible. However, as set out in ES Chapter 11 - Noise and Vibration [APP-067], the road traffic noise levels would perceptibly decrease at footpaths close to the bypassed sections of the A57 due to the Scheme. Noise levels at footpaths close to Mottram Moor junction would be similar to existing conditions as the footpath locations with and without the Scheme are mostly adjacent to the A57. The predicted road traffic noise levels on the footpaths close to the Scheme were similar in the opening year (2025) and the future year (2040) and were not above the Significant Observed Adverse Effect Level except near road crossings. Therefore, no significant adverse effects for noise would occur on footpaths close to the Scheme.	
RR-0877-5	5. The adverse effect on people using public rights of way or walking on access land (in terms of both noise and visual intrusion) caused by the increase in traffic expected to result from the Scheme on the A628 through Longdendale and the A57 Snake Pass. The expected increase of approximately 38% in Annual Average Daily Traffic using the Snake Pass (see Appendix 2.1 of the Environmental Statement), amounting to 1,150 additional vehicles per day in 2025 (including 115 HGVs), would be particularly damaging in that regard.	As set out in ES Chapter 11 - Noise and Vibration [APP-067], the modelled operation phase traffic flows on the A628 were not predicted to cause a perceptible change in noise level in the short or long-term (a change of less than 1dB LA10,18h was predicted). No adverse or significant adverse effects would occur at residential properties or footpaths (such as the Trans-Pennine Trail and Pennine Way) in this area due to the Scheme. Changes to traffic flows on the A57 Snake Pass would result in a minor noise increase in the short-term, which would be perceptible to walkers on footpaths close to these sections of the A57. Footpath users would be exposed to an additional 7 seconds of noise above the Lowest Observed Adverse Effect Level on each side of the road, assuming an average walking speed of 5 km/h. Taking into account the predicted noise levels and the additional noise exposure in these transitory spaces, a significant adverse effect from noise is unlikely to occur. In the long-term, the noise increases would be negligible and not perceptible, resulting in no adverse or significant adverse effects from noise. In terms of visual intrusion caused by an increase in traffic this was identified as an indirect effect, as opposed to a direct effect of the construction footprint of the Scheme. For the A628 and A57 Snake Pass, a number of representative viewpoints were agreed with the Peak District National Park Authority (PDNPA). ES Chapter 7 Landscape and Visual Effects [APP-063] gives the result of visual assessment for receptors in the Peak District National Park (PDNP). Viewpoints 19 and 25 which lie adjacent to the A628 were represented in Table.7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP which addressed both tranquillity and wildness. Viewpoints 22 and 23 lay in close proximity to the A57 Snake Pass. For the visual receptors at these four viewpoint locations the magnitude of change of increased/decreased traffic,	



Response reference	Representation Issue	National Highways Response	Also Applies to
		Therefore, there was no significant effects for visual receptors within the PDNP.	
RR-0877-6	6. The Environmental Statement's assessment of the visual impact of the Scheme on views from public rights of way is considered inadequate. In particular, the Statement concludes that, 15 years after opening of the new roads, there would be "residual significant effects" on the views from only five footpaths (see section 7.9.63 of Chapter 7). PNFS rejects this conclusion. By way of example, those five footpaths do not include footpath number 93 in Longdendale. The magnitude of the effect on the view from that footpath (after 15 years) is stated by the Environmental Statement (see page 87 of Appendix 7.1, item V-P-10) to be only "Minor Adverse" and the significance of that effect is stated to be only "Slight Adverse". As it is clear that walkers on LON/93 would have a panoramic view of the new single carriageway road (in place of the current view of green fields) and as the Year 15 photomontage of the view from the nearby "Viewpoint 8" (see sheet 21 of Figure 7.9v) shows that traffic on parts of the new road would be clearly visible from that viewpoint, this conclusion seems incomprehensible."	In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the environmental assessment process and specialist assessments has been undertaken by a team of competent and qualified consultants who are registered with the relevant institutions and/or chartered. The assessment on visual effect, undertaken by two Chartered landscape architects experienced in Landscape and Visual Assessment (LVIA), meets the requirements of the Design Manual for Roads and Bridges (DMRB) LA 107 Landscape and Visual Effects and LA 104 Environmental Assessment and Monitoring. It has also been informed by the Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3). Throughout the EIA process, consultation was undertaken with relevant local authorities to obtain advice and to comment on and agree the scope of the Landscape and Visual Impact Assessment. These consultations included agreeing viewpoint locations. Details of the consultations are in section 1.5 of Chapter 1: Introduction of the Environmental Statement (APP-060). Footpath 93 was not found to have a significant residual effect whereas the five footpaths referred to elsewhere in this Relevant Representation in section 7.9.63 of Chapter 7 were found to have significant residual effects. Footpath LON/93 was represented by viewpoint V-P-10-LON/93 in Chapter 7 Landscape and Visual Effects Appendix 7.1 (APP-116). The assessment found that in mid-range views the Mottram Moor junction will be partially visible though the Scheme will be partially screened by the earthworks associated with that junction, so that during the construction period and in the winter of year one a moderate adverse (significant) effect was anticipated. However, with mitigation commitments, in particular roadside woodland planting, the effect was anticipated to reduce to slight adverse (non-significant) by the summer of year 15.	
		15.	



RR-0879 Trans Pennine Trail

Response reference	Representation Issue	National Highways Response	Also Applies to
every day as a route to school / work or as part of their leisure activities. It free resource open 24/7 and has been much needed for people during the Covid pandemic. The Trail has given a place for people to forget about the trials of everyday life, to re-connect with nature, to re-engage with their low walking, cycling and horse riding. The Trans Pennine Trail partnership has objected to the format of the Highways England's scheme due to the impart on the Trail. The local countryside is a highly valued natural asset in this and has been a place of sanctity for many Trail users, particularly during the pandemic. The scheme does not take this into consideration. The TPT national office has made representations to every consultation regarding the project. 1. It is imperative that this Highways England's scheme also provides a robust NMU scheme that is in line with the Governments LTN1/20	Authorities across the north of England and is used by thousands of people every day as a route to school / work or as part of their leisure activities. It is a free resource open 24/7 and has been much needed for people during the Covid pandemic. The Trail has given a place for people to forget about the trials of everyday life, to re-connect with nature, to re-engage with their love of walking, cycling and horse riding. The Trans Pennine Trail partnership has objected to the format of the Highways England's scheme due to the impact on the Trail. The local countryside is a highly valued natural asset in this area and has been a place of sanctity for many Trail users, particularly during the pandemic. The scheme does not take this into consideration. The TPT	The landscape proposals for the A57 Link Roads have been designed to mitigate the Scheme's impact to surrounding properties and other receptors including the TPT. In the vicinity of the TPT this includes false cuttings to visually screen the proposals as well as extensive tree planting along the southern edge of the proposed earthworks. There are numerous improvements to non motorised user (NMU) provision throughout the scheme. A new 2.5km bridleway which links the TPT to Old Hall Lane which includes a segregated Pegasus crossing to the west of the new signalised crossroad at Mottram Moor. This bridleway extension (to Old Hall Lane) was included after initial consultation as a desire line to bridleways to the north of Roe Cross was identified.	RR-0203, RR-0208, RR-0326, RR-0409, RR-0671-3, RR-0762, RR-0818, RR-0881
	1. It is imperative that this Highways England's scheme also provides a robust NMU scheme that is in line with the Governments LTN1/20 considerations and provides for equestrians in terms of the Trans Pennine	The Scheme is designed in accordance with LTN 1/20 with appropriate widths and types of NMU facilities designed according to the usage and location detailed in this guidance. This includes where appropriate segregation of different modes and a joined up view of NMU provision with the wider Tameside network. Where existing public rights of way are severed by the scheme these will be reconnected to new provision and linked back to these existing routes.	
RR-0879-2	2. Crossing points should be suitable for all relevant users.	Crossing points have been designed to cater for all anticipated users. This includes facilities for users with disabilities for example tactile paving at crossing locations, if equestrians are expected then a separate Pegasus crossing will be included or if the crossing is for cyclists and pedestrians then segregated cycle/pedestrian crossings or toucan crossings will be specified.	
RR-0879-3	3. Sustainable transport schemes should be safely segregated from all road traffic.	As far as possible, NMU provision is segregated from road traffic in the Scheme.	
RR-0879-4	4. The scheme is not limited to the impact in the location of the A57 link road but the extra traffic generated across the A628 will also hugely impact on sustainable transport users of the Trail due to the existing 3 crossing points on the A628.	The Transpennine Trail crosses A628 east of A6024 at three locations. The traffic flow on this section of A628 as a result of the scheme is forecast to rise by about 800 vehicles per day in 2025 and 900 vehicles per day in 2040 both of which are an increase of less than 7%.	RR-0085, RR-0131, RR-0203, RR-0259, RR-0336, RR-0467, RR-0760, RR-0842,
RR-0879-5	5. The Peak District National Park Authority are working to support a modal shift to sustainable transport modes. Further traffic and congestion is contrary to this.	It is recognised that any measures the Peak District National Park are seeking to implement may help lower vehicular demand accessing and passing through the National Park, however these measures have not been reflected in the forecasts made because measures distant from the scheme cannot be classed as part of the scheme proposals.	RR-0003, RR-0054, RR-0058, RR-0064, RR-0069, RR-0121, RR-0126-2, RR-0133, RR-0167-1, RR-0182, RR-0193, RR-0209, RR-0211 RR-0219, RR-0295 RR-0312,



Response reference	Representation Issue	National Highways Response	Also Applies to
		At a policy level, active travel is a matter for the DfT and at a local level by other government organisations. The NN NPS identifies that relying on alternative transport is not a viable way of managing need. In respect of 'modal shift' (public transport, walking and cycling), it is not realistic to rely on these for all journeys.	RR-0318, RR-0324, RR-0336-1, RR-0335, RR-0346, RR-0366, RR-0397, RR-0409, RR-0449-3, RR-0449-5, RR-0472, RR-0479-2, RR-0479-4, RR-0521, RR-0526-6, RR-0532, RR-0553, RR-0580, RR-0606, RR-0662, RR-0713, RR-0715, RR-0721, RR-0735, RR-0737, RR-0760, RR-0762, RR-0774, RR-0775, RR-0795, RR-0849, RR-0870, RR-0860, RR-0892
RR-0879-6	6. The Trans Pennine Trail has provided details of the impact on the Trail and suggestions where improvements to the sustainable transport offer are needed. As we are now facing a climate emergency it is essential that sustainable transport is recognised as a vital part of the infrastructure of this programme. Should the scheme go ahead the Trans Pennine Trail national office asks that the scheme is re-modelled to give priority to all sustainable transport users to ensure provision is fit for purpose to encourage Trail uses and residents to use them with confidence. Initial discussions with Highways England have identified several improvements that could be made to the scheme and we intend to ensure that implementation of these is carried out if the scheme goes ahead"	Provision for equestrians, cyclists and pedestrians has been included throughout the proposals for the Scheme. This has been extended to respond to representations from local user groups and link up with current and planned provision in Tameside.	



RR-0880 Transport Action Network

Reference response	Representation Issue	National Highways Response	Also Applies to
RR-0880-1	"Transport Action Network (TAN) wishes to register its objection to the A57 Link Roads scheme for the following reasons: The proposed scheme will increase traffic which will increase pressure for more road building in the Peak District National Park. The scheme will increase carbon emissions by a minimum of 438,837 additional tonnes of CO2e, according to National Highways calculations. This figure is arrived at by adding the extra user emissions generated by the scheme estimated to be 399,867 tonnes CO2e and the construction emissions resulting from site clearance and tree felling or land use change or many other aspects. The monetised cost of the additional carbon resulting from the scheme is given as -£17.4m at paragraph 5.2.21 of the Case for the Scheme. However, this does not use the new carbon values published by BEIS on 2 September 2021 which quadrupled the cost of carbon.	Please refer to National Highways' response to the Relevant Representation made by the Peak District National Park Authority in respect of additional traffic (RR-0677-1). The A57 Link Roads is part of a programme of three projects to deliver improvements along the South Trans-Pennine route to improve journeys and safety for the thousands of drivers who use them every day. The other projects are the A61 Westwood roundabout and A628 maintenance and improvement programme. The Environmental Statement considers the impact on the ability of the UK Government to meet its legislated targets regarding climate change, including all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965 MtCO2e, which was adopted by the Government and was due to pass into law at the time in which the Environment Statement was being prepared. Chapter 14: Climate of the ES [APP-070] reported with this policy in view and explained the impact of the Proposed Scheme on Government's ability to meet its legislated carbon reduction targets. With reference to the 399,867 tonnes CO2 equivalent figure suggested in the Relevant Representation, the greenhouse gas assessment in Chapter 14: Climate of the ES (APP-070) has found the net effect of the Scheme would be to generate 116,341 tonnes CO2 equivalent that would not otherwise have been emitted, as far as the end of the sixth Carbon Budget in 2037 (Table 14.16). This is in line with the NN NPS, Paragraph 5.17, which states that applicants should provide an assessment against the Government's carbon budgets. Professional judgment was used over quantification in Chapter 14: Climate insofar as it relates to land use change. The DMRB standard prescribes that a proportionate approach should be taken to this area of the assessment, and our professional judgment was taken according to this proportionate approach. The rationale for this is that due to the short length of the stretch that will be newly built	



Reference response	Representation Issue	National Highways Response	Also Applies to
		The monetised cost of the additional carbon due to road users (greenhouse gas (GHG) emissions) that is reported in the Case for the Scheme (APP-182) was based on the DfT values that were available at the time (June 2021). A high carbon sensitivity test was undertaken, as advised by DfT <i>in lieu</i> of the forthcoming updates, which confirmed the revised value would not reduce the Scheme's benefit cost ratio (BCR) significantly. Subsequently, a sensitivity test has been undertaken using the latest values as published by BEIS in September 2021, and although this results in a larger GHG disbenefit it would not significantly reduce the BCR. The BCR is currently shown as 2.45 in section 5.4 of the Case for the Scheme (APP-182), however this would reduce to 2.33 once the BEIS values are applied to the GHG calculation.	
RR-0880-2	The increase in collisions: National Highways predict there will be 102 extra collisions over the 60 year appraisal period for the scheme. However on the A57 Snake Pass, already a very dangerous road with a high collision rate, due in part to its elevation, extreme weather conditions and sharp bends, there would be an extra 160 collisions over 60 years due to the increase in traffic caused by the scheme. The Combined Modelling and Appraisal Report appears to be missing from the draft DCO application, nor is there an Appraisal Summary Table showing the impacts of the scheme over the 60 year appraisal period, and their monetised costs and benefits.	Please refer to National Highways' response to the Relevant Representation made by Derbyshire County Council in respect of collisions (RR-0240-6). The Combined Modelling and Appraisal Report and Appraisal Summary Table do not form part of the standard document requirements for National Highways' DCO applications.	
RR-0880-3	There has been inadequate consultation on this scheme. The traffic data for the scheme was not available during the consultation stage which has denied people the opportunity to make an informed response. This critical data, which shows increases in traffic on many roads, was only made available in the draft DCO application documentation.	Consultation on the Scheme has been extensive at each stage of development. Application document 5.1 - Consultation Report [APP-026] and associated appendices [APP-027 to APP-052] provide details of this consultation. Scheme development was not sufficiently advanced during the 2020 statutory consultation to make it possible for National Highways to share the detailed traffic data at the time. This is as would generally be expected for a pre-submission consultation. This has now been published with the DCO submission, making it available for review as part of the DCO examination process.	
RR-0880-4	Alternatives to the scheme have not been adequately assessed, including non-roadbuilding alternatives such as detrunking the A628, implementing an HGV ban in the National Park, and redirecting traffic via the motorway network.	Please see the response by National Highways the the Relevant Representation made by Friends of the Trans Pennine Trail (RR-0282-5) in relation to the alternatives assessed. Please see the response by National Highways to the Relevant Representation made by the National Trust in relation to implementing a HGV ban (RR-0620- 6).	
RR-0880-5	It is inconsistent with national planning policy (NPPF and NPSNN) to direct extra traffic through a National Park. The impact on the landscape and the Peak District National Park"	The Scheme is located entirely outside the boundary of the Peak District National Park.	



Reference response	Representation Issue	National Highways Response	Also Applies to
		National Networks National Policy Statement paragraph 5.152 states "There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty".	
		No part of the Scheme is located within a National Park. However, given the location of the scheme in relation to the extent of the Peak District National Park (PDNP), any alternative routes avoiding the PDNP will be substantial in their extra length and as such would be likely to generate additional environmental impacts.	
		Chapter 7 Landscape and Visual Effects of the ES [APP-063], Table 7.29 Indirect Effects on the Landscape Character Areas within the PDNP recognised that traffic numbers would increase for the A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP). For all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity), was not high enough to result in significant effect greater than slight adverse on the landscape character.	

Part 7 – Individuals



RR-0080 Anthony Rae

Response reference:	Representation Issue	National Highways Response	Also Applied to
RR-0080	"As a transport and climate campaigner who works at the local, regional, subnational transport body (Transport for the North) and national levels, the issues I will wish to include within a written representation to be considered by an Examination principally relate to the additional carbon emissions that will be generated as a result of this scheme, and also the additional road traffic. As a member of the DfT/TfN reference group previously considering the possibility of a trans-Pennine tunnel there may also be issues relating to the scheme's strategic context and justification. I have reviewed the outline information prepared by CPRE concerning potential climate change impacts: 'Over 60 years of operation the scheme would add an extra 399,867 tonnes of carbon dioxide. Over a lifetime of 100 years, one tree absorbs around 1 tonne of carbon dioxide but we cannot wait for nearly 400,000 trees to grow for a hundred years. Carbon emissions must be tested against international and national legislation and guidance including the Paris Agreement, the 2008 Climate Change Act's legally binding target of net-zero carbon emissions by 2050, the UK Sixth Carbon Budget, science-based carbon budgets from the Tyndall Centre, and the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'. The potential for an additional 400,000tonnes CO2 needs to be understood in the context of i) the appropriate local transport decarbonisation objectives and targets; ii) the targets of the TfN decarbonisation strategy; iii) the proposed emissions reduction pathway of the DfT transport decarbonisation plan (TDP); and	Please see the response by National Highways to the Relevant Representation made by the Peak District National Park Authority (RR-0677-13). Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council (RR-0240-20) and Climate Emergency Planning and Policy (RR-0161).	



Response reference:	Representation Issue	National Highways Response	Also Applied to
	iv) the transport emissions pathway identified by the Climate Change Committee in their 6th carbon budget report. In the context where transport emissions at both local and national levels have not reduced significantly below the 1990 baseline level for the Climate Change Act, have stayed level or even increased in the 5 year period up to 2019 (pre-covid), and are taking up an ever increasing share of local and national carbon budgets, then it's imperative that the potential carbon generation impact of the scheme is rigourously scrutinised against local/regional/national targets for radical transport decarbonisation. Since at the present time the results of the consultation on the TfN strategy had not yet been published, and the dataset underpinning the TDP has not yet been released, it will be necessary to review the scheme's impact in relation to those strategic frameworks at a later date. It will also be necessary to understand the outputs and validity of the traffic generation modelling, which within the Trans-Pennine tunnel working process were never adequately revealed."		



RR-0182 Daniel Wimberley

Response reference:	Representation Issue	National Highways Response	Also Applies to
RR-0182-1	recommend its construction and the Secretary of State were to give the go- ahead, it is wide open to legal challenge (see section LEGAL below). It has Case for the Scheme (APP-182), chapter 2. The A57 Link Roads Scheme forms part of National Highways overall Southern Trans-Pennine	improvements, along with improvements at the A61 Westwood roundabout and the A628 technology improvements. No other related schemes are	
	1 Confusion about the scope and purpose of the scheme 50 years in the making suggest deep-seated problems with this scheme. This needs to be explored – just what is the problem (or problems)? The proposers tell us little about the history of this scheme (see TAR 1.4.4 – 1.4.6, which does not link to any further explanation so I assume there isn't one.) In particular the proposers HE seem to imply benefits for the scheme from other yet to be formulated, yet to be consulted on "gleams-in-the-eye" sections. These should be excluded from consideration by the EiP.		
RR-0182-2	1a Aims of the scheme It was hard for me to find these amongst the consultation documents – in a form that is where they were operational things which could be defined and measured and not "wishes". I will, and the panel should, create a list of what the aims actually are, distilled from the documents of HE and then consider the big question: what is the most costeffective, user – friendly etc. way of meeting these aims – and is it this scheme? Or does the scheme really not pass this test?	The Scheme objectives are set out in the Case for the Scheme (APP-182), section 3.6 and Table 3-5 Compliance with Scheme objectives.	RR-0452, RR-0580
RR-0182-3	2 History of the scheme and road alternatives to the option being put forward On the face of it the scheme i.a. funnels traffic through Tintwistle and Longdendale and therefore increases traffic nuisances in these two settlements settlements. Why was the option including a bypass for these two settlements not taken forward and offered for consultation?	In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Environmental Statement includes a description of the reasonable alternatives studied by National Highways, which are relevant to the Scheme and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment. on the environment. This is presented in Chapter 3: Assessment of alternatives of the Environmental Statement (APP-060). The current Scheme has evolved over more than 50 years as different ideas have been considered and discarded to address the longstanding connectivity and congestion issues identified. Table 3-1 of Chapter 3 provides the timeline of the 50-year history of the different schemes explored and clarifies where the alternatives to the specific Scheme assessed in this ES are considered.	



Response reference:	Representation Issue	National Highways Response	Also Applies to
		Whilst the Scheme assessed in the Environmental Statement is presented as a separate Scheme to those considered before the TransPennine feasibility studies published in 2015, note has been taken of earlier options. The current design development has therefore been informed by historic study information. In developing options for the Scheme, a range of highway options were assessed in terms of delivering Scheme objectives, cost and key issues and risks.	
RR-0182-4	3 government policy on climate change The consultation hardly referred to this aspect at all. This is odd when climate change and its ramifications are the defining issue of our time and when government policy and guidance evolves almost monthly on this, and always in the direction of firmer tackling of the Climate Emergency. I will, and the panel should, consider the effect of this evolution on the case for the scheme. 3a government policy on equality I will, and the panel should, examine how this scheme fits in or does not fit in with the government's emphasis on equality – sometimes referred to as "levelling up".	Please see the response by National Highways to the Relevant Representation made by Peak District National Park Authority in respect of carbon (RR-0677-13). 3a The Population and Human Health assessment identifies vulnerable groups within the study area from a review of the population and human health baseline for Tameside and High Peak Local Authorities as a whole, as well as data from within these areas (e.g. Ward level data and data from Lower Super Output Areas). This is reported in Chapter 12: Population and Human Health of the Environmental Statement (APP-068). This includes identification of inequalities that exist in the health and healthcare experiences of different groups. The assessment then ascertains the likely positive and negative effects of the construction, operation and maintenance of the Scheme for wider and vulnerable groups as well as opportunities for improving health and reducing inequalities.	
RR-0182-5	4 specific effects of climate change on the scheme Is the scheme resilient enough to face the new risks brought about by climate disruption?	The assessment of the scheme against risks associated with climate change is set out in Chapter 14: Climate of the Environment Statement (APP-070), Table 14-17: Potential operational impacts on asset receptors (including their operation, maintenance and refurbishment).	
RR-0182-6	5 the traffic network predictions – technical The proposer publishing this data as late as possible has a) undermined the public consultation (I return to this later, in the LEGAL section) and b) made it more difficult for the predictions, the methodology and assumptions underlying them and the way the methodology was applied, to be peer-reviewed or scrutinised. The EiP should not "take them as read," and nor will I. (See also para. 11 on VfM.)	The Transport Assessment Report (TAR) was published as a part of the DCO submission in line with DCO guidance. The information it contains was not available for the 2020 statutory consultation as it was too early in the Scheme development process. However, the Applicant did share as much information as was available at the time. Stakeholders and community now have the opportunity to express their views on the traffic data as part of the DCO examination process.	
RR-0182-7	6 the traffic network predictions – substantive We now see, (though consultees could NOT see) that were the scheme to be built, traffic is predicted to increase on roads across the local area. I will, and the panel should, examine the consequences of this for all traffic nuisances, and establish how many people are affected under different scenarios.	Please see the response by National Highways to the Relevant Representation made by Sharefirst my journey to school (RR-0796-4)	



Response reference:	Representation Issue	National Highways Response	Also Applies to
RR-0182-8	7 the effects of the scheme on local people I will, and you should, look closely at these effects. I intend to show that the scheme will not improve the lives of local people – their health, their environment, their businesses, their access to work - in fact quite the reverse. This is a completely failed version of "levelling up".	Chapter 12 Population and human health of the ES (APP-068) identifies vulnerable groups within the study area from a review of the population and human health baseline for Tameside and High Peak Local Authorities as a whole, as well as data from within these areas (e.g. Ward level data and Lower Super Output Areas). This is reported in Table 12.13 of ES Chapter 12. This includes identification of inequalities that exist in the health and healthcare experiences of different groups. The assessment then ascertains the likely positive and negative effects of the construction, operation and maintenance of the Scheme for wider and vulnerable groups as well as opportunities for improving health and reducing inequalities. ES Chapter 12 finds that, during construction, the works have the potential to result in a Negative Health Outcome owing to temporary severance, disruptions to access, pedestrian and cyclist delays and increases in journey length as well as temporary loss of amenity on affected PRoWs. Motorised vehicle travellers and/or other public transport users in the study area are also likely to face temporary disruptions to travel activity, delays and/or increased commuter times due to construction activities, increases in construction vehicles, introduction of restrictions and diversion routes and traffic management. This may result in some wider groups and vulnerable groups having to change their travel patterns or find alternative arrangements. Lower income groups and vulnerable groups could be disproportionately affected by any impacts. While this is also considered to result in a Negative Health Outcome it is important to note that this is temporary and limited to the construction phase.	RR-0461
		During operation, provision of improvements on the existing A57(T) and A57 with the possible inclusion of cycle lanes, improved pedestrian and cyclist crossing facilities at the M67 Junction 4, and all new junctions created by the scheme, upgrading of the PRoW LON 52-20 from a footpath to a bridleway, increasing the availability of suitable equestrian facilities away from road traffic and the creation of a combined footeway and cycleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans Pennine Trail (National Cycle Network route 62) are associated with a Positive Health Outcome and significant beneficial effects for walkers, cyclists and horse riders. In respect of social cohesion, during operation the Scheme would reduce community severance through the separation of local and regional traffic resulting in large reductions of traffic on the existing A57. This would allow the opportunity to make this stretch of road much more friendly to cyclists and pedestrians (across all groups) through improved facilities and crossings, public realm improvements and reduction in speed. This is anticipated to lead	



Response reference:	Representation Issue	National Highways Response	Also Applies to
		to positive benefits to health and wellbeing and is therefore associated with a Positive Health Outcome. Traffic congestion issues will be alleviated with significant reductions in traffic predicted at Mottram Moor (between Back Moor and Stalybridge Road, Hyde Road and Woolley Lane), therefore providing a safer and more pedestrian friendly environment in the village. The Scheme makes considerable provisions for walkers, cyclists and horse riders, improving connectivity and the new link roads would also provide for more reliable, shorter journey times.	
RR-0182-9	8 non-road alternatives to the scheme This scheme, expensive in finance and resources as it is, will pre-empt and make less likely alternative investments which WOULD improve local people's lives. I will consider, and so should the panel: were such alternatives considered by HE, should they have been included in the consultation, the fact that without them the consultation was fatally biased, (see also paragraph 12) and whether what happened contradicted government policy and guidance. A particular case is the need to fund and implement staggering improvements to the rail network.	Proposals for improving passenger and rail connections were set out in the <i>Integrated Rail Plan for the North and Midlands</i> ⁵ published by Department for Transport in November 2021. The proposed Scheme does not preclude any of these proposals. However, these are matters of wider transport policy which is the responsibility of the Department for Transport.	
RR-0182-10	9 Green Belt The scheme goes straight through the Manchester designated Green Belt. Once again I do not remember seeing these words in the consultation documents. For the significance of this kind of omission see the LEGAL section. What is the value foregone here? The government now has a whole agenda around valuing natural capital. What are the implications for the case for this scheme?	Please see the response by National Highways to the Relevant Representation made by CPRE Peak District and South Yorkshire (RR-0170) in relation to the Green Belt. Please see the response by National Highways to the Relevant Representation made by Friends of the Earth, England, Wales and Northern Ireland in relation to the natural capital (RR-0281-5).	
RR-0182-11	10 the "growth" argument This important argument – that economic growth is 'held back by this imperfect road' - is stated at e.g. TAR para. 1.1.1. It may seem plausible, obvious even, but I will, and you should, look at this carefully. I think it will not stack up under rigorous questioning from myself and the panel.	The A57 link from the M67 to the A628 is a key arterial route connecting businesses along the route from Manchester to Sheffield, with towns such as Glossop, Hadfield and Hyde already experiencing delays through this section of the network. In coming years these delays are forecast to increase as levels of traffic rise. These delays, with increased and unreliable journey times, act as a barrier to businesses working together and gaining benefits of agglomeration. They also create a barrier to the workforce, constraining the areas which individuals may consider commuting to and so making it more difficult to access higher-skilled and higher-valued employment.	RR-0762
RR-0182-12	11 Value for Money (VfM) and Benefit-Cost Analysis (BCA) The EiP must carefully examine this, the following factors come to my mind:		

Planning Inspectorate scheme reference: TR010034 Application document reference: TR010034/EXAM/9.5

 $^{{\}color{red}^{\underline{5}}} \, \underline{\text{https://www.gov.uk/government/publications/integrated-rail-plan-for-the-north-and-the-midlands}}$



Response reference:	Representation Issue	National Highways Response	Also Applies to
RR-0182-13	The history of this scheme suggests a degree of muddle, the panel must beware of conceptual errors	The history of the scheme is discussed in R-863-1. The assessment of VfM has been carried out based on the merits of the current scheme, having gone through option assessment to identify the preferred route and further optimisation to best deliver on the objectives.	
RR-0182-14	The effect on traffic nuisances throughout the whole area, now that HE have published traffic predictions, and the consequences for VfM	The cost benefit analysis (CBA) is based on the outputs of the traffic modelling used to assess the Scheme, as reported in the Transport Assessment Report (APP-185).	
RR-0182-15	The effect of changes in society on predicted traffic e.g. less commuting, and hence on some of the assigned values	Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council in relation to the natural capital (RR-0240-5).	
RR-0182-16	How goods traffic will evolve/reduce in the coming decades	The traffic forecasts that have been used for the assessment of the Scheme are based on the most recent Department of Transport (DfT) projections of future demand for commercial vehicle traffic (Road Traffic Forecast - RTF 18).	RR-0069, RR-0126, RR-0167, RR-0240, RR-0312, RR-0336, RR-0338, RR-0355, RR-0433, RR-0461, RR-0466, RR-0623, RR-0762, RR-0803, RR-0818
RR-0182-17	The effect of policies to promote sustainability one example being the promotion of active travel and public transport within the National Park.	The majority of the traffic using the A57/A628 Trans Pennine corridor during the peak periods will be through traffic, with very little associated with visiting the Peak District National Park. Consequently, policies to promote active travel and public transport within the National Park are unlikely to have a significant effect on peak period traffic volumes using the A57/A628 Trans Pennine corridor and, thus, peak period traffic congestion through Mottram that the Scheme is addressing.	
RR-0182-18	LEGAL AND QUASI-LEGAL ISSUES 12 the consultation may have been illegal and was certainly non-compliant with Nolan The information provided by HE to the public at consultation stage was inadequate, in particular they did not provide the public with their traffic network data, both predicted (as at the time of the consultation) and actual. The public were therefore unaware of the situations regarding traffic nuisances and could not come to an informed view. Other important information was also missing. This non-provision of essential information to the public breaks both the Nolan Principles and the obligations laid upon HE by the SOCC. There were also other breaches of their obligations under the SOCC. If there is no satisfactory explanation, then I submit that the consultation must be ordered to be re-run.	DCO guidance sets out what information is expected to be provided at what stage of Scheme development and consultation. The Applicant has followed this guidance. Please see answers R863-3, 5 and 9 for further information. The Applicant delivered the consultation in line with the Statement of Community Consultation (SoCC), which was consulted on with the relevant local authorities, and approved by them before publication.	RR-0069, RR-0126, RR-0167, RR-0240, RR-0259, RR-0312, RR-0336, RR-0338, RR-0355, RR-0372, RR-0409, RR-0433, RR-0461, RR-0466, RR-0623, RR-0698, RR-0775, RR-0803, RR-0818, RR-0905



Response reference:	Representation Issue	National Highways Response	Also Applies to
RR-0182-19	13 air pollution There are legal limits which constrain schemes such as this. I will and the panel should, consider this matter carefully and ensure that HE are complying with the legal requirements in this area."	It is acknowledged that air quality in the vicinity of the A57 Link Roads Scheme does not currently meet UK government air quality standards. Local air quality monitoring data indicates that there are currently exceedances of the annual mean UK government air quality strategy (AQS) objective for nitrogen dioxide (NO ₂) in Denton, Hyde, Mottram, Woolley Bridge, Hollingworth and Dinting Vale. There are also exceedances of the hourly mean AQS objective for NO ₂ adjacent to the A57 in Mottram. Air Quality Management Areas (AQMA) are present with the Scheme footprint (Greater Manchester AQMA) and the wider air quality study area for the scheme assessment (Glossop AQMA). These AQMA have been designated due to the exceedances of UK government AQS objectives for NO ₂ . However, there are no exceedances of particulate matter AQS objectives in the vicinity of the Scheme.	
		The Scheme will involve the construction of new roads. These new roads would provide a bypass of the existing A57 where air quality is currently above UK government AQS objectives, moving traffic emissions away from the adjacent residential properties areas and improving air quality in these locations. It is acknowledged that there would be increases and decreases in air pollutant concentrations on existing roads that are not bypassed as a result of changes to route choice which would lead to changes in traffic levels and hence changes in emissions. However, the assessment presented in Chapter 5 Air Quality of the ES [APP-061] did not identify a significant adverse effect on human health due to the Scheme and overall found the impact of the Scheme on air quality would be an improvement. Under the Environment Act of 1995, local authorities are responsible for assessing current air quality in their jurisdiction, developing action plans to reduce concentrations and addressing exceedances of government AQS objectives. The National Highways Scheme is a part of this action plan to reduce the extent and magnitude of exceedances of government AQS objectives, however National Highways does not have the full responsibility to remove all exceedances in the vicinity of the Scheme. Residual exceedances are still the responsibility of the Local Authority, requiring further measures to be identified and implemented.	



Other Individual Issues

1.1.1 This section contains National Highways' responses to the Relevant Representations submitted by individual members of the public which raised unique issues.

Response reference:	Representation Issue	National Highways Response	Also Applies to
Anne Robinso	n		
RR-0069	High risk of flooding – at Brookfield and from the Mottram Moor underpass has yet to be fully addressed.	The Flood Risk Assessment (FRA) (APP-056) draws on a range of disciplines and designs, including, drainage, earthworks, culverts, and previous hydrological and hydraulic modelling to ensure all sources of flood risk are assessed as part of the FRA. The FRA describes the existing flood risks for all flood risk sources, followed by an assessment of flood risks to the Scheme, mitigation measures and lastly residual flood risk. With specific reference to Brookfield, the flood modelling indicated an opportunity to provide betterment to property and infrastructure on the left bank in the vicinity of Brookfield (A57), with the betterment achieved by increasing an embankment height along the left bank of the river and lowering the bank height and flood plain levels on the right bank to create additional storage and increase conveyance. A proposed embankment on the left bank upstream of the proposed bridge crossing, provides flood protection to properties along Brookfield (A57) and the new T junction.	
Carl Askham			
RR-0116	"This has been rumbling on for the whole of the last 30 years I've lived here and for many more before according to old friends and acquaintances! It will never happen!! Complete waste of time and space!!!!!"	Proposals for the improvement of the Trans Pennine route have been the subject of extensive study and consultation since 1989. The history of this Scheme and route selection process is described in section 2 of the Case for the Scheme (APP-182).	RR-0795
		As explained in Section 3 of the Funding Statement (APP-024) The Government committed to delivering and funding this scheme in its first Road Investment Strategy (RIS1) published in 2015 and subsequently reiterated this commitment in RIS2 published in 2020. It is National Highways' intention to implement the Scheme at the earliest opportunity. The opening of the completed Scheme is expected in 2025, following the completion of the construction phase.	
		As explained in Section 10 of the Transport Assessment Report (APP-185) the Scheme will provide time saving benefits and relieve congestion through Mottram, Hattersley and Woolley Bridge, improving journey times for trips on the Strategic Road Network (SRN) between Manchester and Sheffield, as well as for trips using the local road network in this area. The Scheme will also relieve congestion on the de-trunked section of the A57, improving connectivity for local traffic.	



Response reference:	Representation Issue	National Highways Response	Also Applies to
Charlotte Far	rell		
RR-0126	3. It would mean additional traffic through the village of Bamford which already sees vehicles queuing at peak times on weekends because the volume of traffic is too great for the narrow road through the village causing tailbacks.	Traffic modelling undertaken to assess the impact of the Scheme indicates that the traffic flow on the A6013 through Bamford will marginally reduce by 1% compared to without the Scheme.	RR-0442, RR-0540
Colin O'Flahe	erty		
RR-0167-1	the traffic benefits to Mottram come at the expense of others.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57, the A628 and some other roads, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57, A628 and some other roads, which means that with the Scheme traffic flows on some roads are forecast to increase.	
		However, the Scheme overall is forecast to result in traffic re-routing away from local roads on to the new link road, as well as from parallel routes across the Pennines.	
		Furthermore, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared to without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as to without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	
RR-0167-2	A 4 way traffic light controlled junction at the top of Mottram moor will cause even more standing traffic than there currently is	The design of the junction for the crossroads of the new link road with the existing A57 at Mottram Moor has been designed to accommodate the forecast traffic flows taken from the outputs of the traffic modelling undertaken to assess the impact of the Scheme. Consequently, the proposed junction is forecast to operate within capacity, with the traffic queues on all approaches to the junction forecast to fully clear every cycle of the traffic signals. Traffic flows on the existing A57 at Mottram Moor is forecast to reduce by up to 44% with the Scheme compared to without it. Therefore, traffic demand at this junction of the link road will be significantly reduced, which will mean less standing traffic on the existing A57 at Mottram Moor compared to without the Scheme.	



RR-0342

David Morgan

RR-0208

"Concern over the increase of traffic through Hollingworth and Tintwistle and the impact on air quality in these villages as a result of the proposed link roads. The proposed scheme should enable traffic to flow better through the aforementioned villages, however as a result of this I believe more vehicles will be encouraged to use this route adding yet more air pollution and increasing road safety issues through these villages. The whole area needs a full and comprehensive scheme which bypasses Mottram, Hollingworth and Tintwistle instead of the proposed scheme which only shifts the congestion to different parts of Glossopdale but has the overall effect of increasing traffic through the area."

The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with latest best practice as set out in the National Highways Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The traffic change criteria were applied to traffic output from the scheme specific traffic model, which includes strategic roads, including the A628 through Tintwistle and Hollingworth, to determine the Affected Road Network (ARN). The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP-076).

The traffic change criteria are exceeded on the A628 through Hollingworth but not on the section of the A628 through Tintwistle. Where traffic change criteria are not exceeded this indicates that there would not be a significant adverse effect on air quality due to the Scheme in these locations. Where sensitive receptors are located within 200m of the ARN, as they are in Hollingworth, they have been included in the air quality assessment. The air quality assessment of the Scheme presented in Chapter 5: Air quality of the Environmental Statement (APP-061) indicates that on balance there will be an overall improvement in air quality due to the Scheme and where there are any increases in concentrations these are not expected to result in any significant adverse effects with the Scheme.

As a result of increases to flow through Hollingworth and Tintwistle there is a forecast increase in accidents in this location, from 2.3 accidents on average per year to 2.4 accidents per year, though this change represents a small relocation of accidents from other parts of the road network rather than a negative safety impact in general.

David Roberts

RR-0216

"I am happy with the project. I am NOT happy that the roadway opposite my house is elevated and no in a cutting. I am NOT happy about only traffic calming on Woolley Lane, this needs a weight limit and a NO HEAVY VEHICLES, also something to deter it becoming a rat run or short cut to the Industrial Unit at Etherow Ind Estate. D Roberts"

The alignment of the Scheme takes account of a number of things, including tying in with existing roads, crossing the River Etherow, passing beneath Roe Cross Road, along with the more general land form in the area. The road design is also restricted in the gradients that can be used to ensure that all vehicles can use it safely and efficiently.

The Scheme proposes a 20 mph speed limit along Woolley Lane and routes to the Etherow Industrial Estate will be signed via the Glossop Spur. The extent of traffic calming and other restrictions is subject to discussion with Tameside Metropolitan Borough Council and Derbyshire County Council.



Dr. Jeffery Brown

RR-0259

5. Mottram underpass and road structures through Mottram showground severely damages the rural character and heritage of the area including the demolition of historical buildings on Old Hall Lane. The scheme is detrimental to the remaining grade 2 listed buildings with increased noise and air pollution. The very popular historical Mottram Agricultural Show will also be abandoned if the scheme progresses

Chapter 6: Cultural Heritage of the ES (APP-062) identified less than substantial harm to result for twelve listed buildings and two conservation areas. In accordance with the requirements of the National Networks National Policy Statement these impacts have been minimised as far as possible through the design process and appropriate mitigation embedded in the design of the Scheme.

Overall, this results in limited harm to the historic environment and must be weighed against the wider public benefits of the Scheme.

Consultation undertaken in May 2021 with Historic England, the governmental advisor on the historic environment, confirmed that Historic England were content with the approach taken to the assessment and its findings in relation to listed buildings and conservation areas.

As detailed in section 6.8.5 of Chapter 6: Cultural heritage of the ES, historic building recording of the Cottages on the north side of Old Hall Lane would be undertaken to provide a detailed record of this asset prior to removal for construction of the Scheme. Historic building recording would be undertaken to Level 3 standards as defined in the Historic England guidance Understanding Historic Buildings, A Guide to Good Recording Practice (2017).

The Showground has relocated to a new Showground area located on an area of land off the A560 Mottram Old Road and adjacent to Apple Street, in Hyde. This new location is approximately 1.8 km south west of M67 Junction 4. The retained section of the existing Showground would be returned to grazing land once the Scheme is open.

Gordon John Gange

RR-0304

"I live in Hadfield, close to the A57. Like many in the Glossop area I do not want this scheme to go ahead until the Tintwistle stage is complete. A Mottram Bypass is not going to help Tintwistle, which desperately needs it. Furthermore I have several times raised the point that far from being a 'Glossop Spur', the Glossop exit is still being shown on all the maps as the main route. If this is signposted 'Glossop and Sheffield' it will funnel all the traffic into Glossop. I would like officially to contradict our MP's assertion that people who don't want the Bypass are 'professional protesters from outside the area'. I live in the area (the south end of Hadfield, a few hundred yards from the A57) and what I hear and discuss does not in any way support Mr Largan's assertion."

Signage to be erected as part of the Scheme will direct traffic travelling between Manchester and Sheffield to use the A628, rather than A57.

RR-0203



Hazel Jones

RR-0324

"I am against the bypass because - - more pollution - destruction of wildlife habitats of deer, badger and fox which we see regularly where the road will be. - will bring more traffic to the area which will probably then make the bypass road blocked. - pointless as just moving traffic from one place to another -destroying our countryside and our village. - more roads is not the answer don't we want to stop climate change? Why do we have to build more roads instead of thinking of ways to prevent more traffic l.e - stop building more houses in Glossop and surrounding areas it is ridiculous! Building another road is not an option why can't you use your brains and spend the money on something useful - Open the railline back on woodhead - the solution is changing the lights at the top at mottram this is what stops the flow of traffic a simple solution instead of a new road making new traffic in more areas! - ban HGV's the pollution in hollingworth and up the Moore is too much! This bypass has destroyed my aunties life for over 30 years and continues to with this new plan as they try again to destroy her house!! She will not move and you will not destroy our lives and our countryside!"

Chapter 8: Biodiversity of the ES (APP-064) presents the biodiversity assessment associated with the Scheme. The Scheme would result in an increase in notable habitats in terms of area and quality to ensure that sufficient habitat is provided. Mitigation has been provided for protected species (including a dedicated bat roosting structure and a range of bat/ bird nesting boxes) and several crossing points (such as taller vegetation to encourage bats/birds to fly higher over the carriageway) to aid connectivity across the Scheme. Five mammal passes (purpose-built piped crossings) would be installed along the road network in strategic locations to increase the permeability of the Scheme for badgers and other mammals (brown hare and hedgehogs). Furthermore, connectivity is retained through three underpasses, six culverts, and the River Etherow Bridge which would be utilised by a range of species.

Planning applications for proposed developments are required to be supported by Transport Assessments that will identify any traffic or transport related adverse impacts that they cause. The developers of those schemes are responsible for proposing and funding highway improvements to accommodate additional development generated traffic and mitigate any identified adverse impacts. It is not National Highways' responsibility to provide the additional road capacity to enable delivery of individual developments.

The M67, A57, A628, A616 corridor is part of the Strategic Route Network for which National Highways is the highway authority. As such, this corridor is identified as being a suitable route for strategic, inter-regional and inter-urban traffic, including for all types of commercial traffic such as heavy good vehicles (HGVs). Consequently, the route is included in the National Primary Road Network that connects primary destinations across the UK and has green-backed direction signs. Therefore, it is not appropriate to restrict access for HGVs along the M67, A57, A628, A616 corridor. Restricting access for HGVs on other roads within the Peak District National Park would be the responsibility of Derbyshire County Council as the highway authority for these roads, rather than for National Highways to consider.

Whilst the Woodhead rail tunnel structures do still exist, National Grid bought the tunnels and installed high voltage cables to transmit electricity. On 5 November 2013 the then Transport Minister Stephen Hammond made a Written statement to Parliament

(https://www.gov.uk/government/speeches/woodhead-tunnels) which stated that the existing tunnels would not be suitable for reuse and that "the best solution is most likely to be the construction of a new tunnel". Further study into rail connections between Manchester and Sheffield is being undertaken by Transport for the North (TfN). The A57 Link Roads scheme will not preclude the schemes being considered by TfN through its Long Term Rail Strategy (LTRS).

RR-0089, RR-0118, RR-0199, RR-0295, RR-0324, RR-0363, RR-0366, RR-0409, RR-0415, RR-0446, RR-0466, RR-0472, RR-0526, RR-0571, RR-0579, RR-0626, RR-0722, RR-0795



The inclusion of Ms Jones's aunt's property within the boundary of the scheme has been the subject of many discussions between the family and the National Highways project team, the property is currently blighted by the scheme and is required to enable the construction of the scheme but is not directly on the line of the scheme. Discuss have been ongoing approximately every two months to provide update on the scheme and its impact. National Highways has confirmed to the family that the National Highways project team is reviewing information from site investigations and the National Highways team has indicated to the family that it is exploring options to potential retain the property if it is to safe to do so. This is regularly communicated to the family and an explanation as to the current status is provided.

Ian Beckett

RR-0338

"This scheme will not decrease the overall traffic reduction through Mottram, Hollingworth and Tintwistle. This scheme only addresses Mottram and Mottram Moor road. Moving the bottle-neck from the end of the M67 to the A57 at Spring Tavern will not achieve this. The traffic infrastructure leaving Glossop has not been addressed since I relocated here in 1975 - in the meantime Glossop has seen a consistent growth in population and therefore the daily commuter traffic. The main A57 through Dinting and the town centre can already add 20 minutes to a journey. This spur will not alleviate this but increase volume further, I understand at least by 20% but possibly 40%. A recent survey lead by the Wythenshawe Lung Unit shows that Glossopdale is in the top 23 sites of the UK with deaths from lung cancer. More vehicle fumes will not improve this situation."

The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57, the A628 through Tintwistle and some other roads, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57, A628 and some other roads, which means that with the Scheme traffic flows on some roads are forecast to increase. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it.

However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.

The Scheme is forecast to result in an increase in traffic on Dinting Road and Shaw Lane. This route is currently a well-known and well-used alternative to the A57 through Glossop. This is because of traffic congestion and delays on Glossop High Street at certain times of day. The scheme itself is not introducing any specific measures on this part of the network that would modify this traffic behaviour. The resulting forecast increase in traffic by 2040 on Dinting Road due to the Scheme is up to 1,600 vehicles per day (+50%) and on Shaw Lane it is up to 1,000 vehicles per day (+14%.) However, the absolute increases in traffic flow are forecast to be relatively low at up to 91 vehicles per hour (less than 1 vehicle per minute each way) on Shaw Lane and up to 159 per hour on Dinting Road (less than 1 vehicle every 45 seconds each way).

The air quality assessment of the Scheme presented in Chapter 5: Air quality of the Environmental Statement (APP-061) indicates that on balance there will be an overall improvement in air quality due to the Scheme.



Iram Younis			
RR-0346	"I am opposed to this scheme for the reasons stated below: I disagree with the fundamental premise on which the scheme is based. The application refers to strategic routes between Manchester and Sheffield which are needed in order to boost economic activity. I disagree that any route across the Peak District National Park should be considered strategic. The area should be fiercely protected. Furthermore, we are facing a Climate Emergency, the greatest challenge we face as a species. We should not be building new roads which inevitably lead to more traffic. Instead we should be focussing on sustainable solutions and aiming to reduce overall traffic volumes. I don't believe the benefits stated are acheivable - the bypass will do nothing to improve the reliability of journeys between Manchester and Sheffield. It will exascerbate it as it will lead to more traffic on the same unreliable roads. I don't think the consulation was conducted properly and should have been delayed until after the global pandemic. I know many people who hold strong views on the scheme who were not aware of the proposal due to lockdowns, bereavement and loss of employement. A new, more thorough consultation should be conducted in 2 years time once people have had time to recover from the impact of the pandemic."	Please see the response by National Highways to the relevant representation made by CPRE Peak District and South Yorkshire (RR-0170-1) in relation to vehicle restrictions and the climate emergency. Please see the response by National Highways to the relevant representation made by Derbyshire County Council in relation to vehicle routing The Scheme is much needed in the area, so despite the limitations imposed by COVID 19 the Applicant worked hard to develop a consultation methodology that incorporated a wide range of formats and events, giving everyone a chance to have their say on the proposed scheme changes. As set out on the Consultation Report (APP-026) and Appendices the Applicant received many more responses than normal to the consultation – around three times the number received for the 2018 consultation – with two thirds in favour of the scheme and the great majority of respondents agreeing that despite COVID-19, the Applicant delivered an effective consultation.	RR-0259-1, RR-0409 RR-0698-12, RR-0905
James Const	tantine		
RR-0359-6	the road goes from 2 lanes back to one when you are going back to glossop so how on earth does this work??	Two right turning lanes are required to enable the signal controlled junction to function effectively. There are then two lanes for a short distance towards Glossop before this merges back to one. Please see the road design shown on Scheme Layout Plans (APP-011), Sheet 6.	
John Youatt			
RR-0446-1	"To be sure that the planning balance between harm to the natural environment is justified by an essential need to manage traffic better.	A Case for the Scheme (CftS) (APP-182) was submitted in support of the Scheme it provides details on the need for the Scheme, the development options considered, the planning history and the compliance of the Scheme with the requirements of relevant planning policies at the national and local scale. The CftS also summarises the key environmental assessments undertaken to inform the Scheme design and any proposed mitigation. It provides details of the traffic assessment and related economic analysis upon which the need for the Scheme is based. The CftS demonstrates that the Scheme achieves a positive planning balance when weighing up impacts against the public benefits of the Scheme. The CftS and accompanying appendices sets out the policy context against which the Scheme should be viewed, it demonstrates that there is a clear case in favour of the Scheme grounded in national, regional and local planning policy.	



		The Scheme is supported by the Environmental Statement (ES) (APP 058 -	
		073) to establish the impacts and mitigation measures required to ensure that the Scheme is acceptable.	
Jon Whitley			
RR-0447	2. It's widely acknowledged that adding to a road network only serves to reduce congestion for a short period. Motorists have a level of tolerance for congestion (which is arguably rising over the long term) and so traffic will naturally increase to fill any new road capacity until congestion levels match or exceed those experienced today. The resultant cost will be that that level is reached with increased road traffic, flying in the face of the National Planning Policy Framework which requires 'radical reductions of greenhouse gas emissions'. Add to that the carbon cost of building the infrastructure and destruction of any natural habitat unlucky enough to be in the way.	Please see the response made by National Highways to the Relevant Representation made by Sharefirst my journey to school in relation to changes to traffic flows on the network (RR-0796-4) Chapter 14: Climate of the Environment Statement (APP-070) considers the impact on the ability of the UK Government to meet its legislated targets, including all Carbon Budgets advised by the Committee on Climate Change (CCC) that are relevant to the lifetime of the scheme, including the sixth Carbon Budget of 965MtCO ₂ e, which was adopted by the Government and was due to pass into law at the time in which the Environment Statement was being prepared. The ES Climate Chapter reported with this policy in view and explained the impact of the Proposed Scheme on Government's ability to meet its legislated carbon reduction targets.	
		Furthermore, mitigation measures that are embedded into the Scheme design will make sure opportunities to reduce emissions are considered throughout the life of the Scheme, including the construction.	
Jonathan Can	ntrill		
RR-0449-2	In fact creating the link road will attract more traffic to the whole of Glossopdale as cross pennine traffic looks for a quicker route. The A624 between Chapel-en-le-Frith is already subject to many HGV vehicles for which the road is particularly unsuitable, the building of the new road will significantly increase the likelihood that they will chose this route.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57 and the A628, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57 and A628, which means that with the Scheme traffic flows on some roads are forecast to increase, including on the A57 and the A628.	
		However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	
		Traffic modelling undertaken to assess the impact of the Scheme indicates that the traffic flow on the A624 between Chapel-en-le-Frith and Glossop will reduce by up to 5% compared to without the Scheme.	



RR-0449-6	Fourthly I regularly use the A555 airport link road, a recently completed bypass scheme which cost an incredible £550m and has done nothing to alleviate the original congestion, is poorly designed (similar to the proposed A57 link roads), floods to the point that it has to close regularly, causes tailbacks for miles around the area. A direct comparison with how this road joins the A6 at High Lane will clearly show without question the current A57 Link Roads proposal will not work and should be scrapped immediately under its present form.	The comments have been noted.
Kalah Ashdo	wn	
RR-0467	Not only air quality: I live on Manchester Road in Tintwistle, my living room is 1.5 metres from the road, a road where traffic drives through, every day, exceeding the speed limit of 30 mph. We have no speed cameras or traffic calming measures. These speeding road users, driving erratically through the villages are lethal to pedestrians and cyclists!	
Karen Smith		
RR-0472	[On a national level we need policies that divert freight from the road to the rail network, an encouragement of home working, and better community planning so that people do not need to travel so often for work or shopping. We also need generous subsidies for electric cars so that the traffic that remains is less polluting]	These are matters of wider transport policy which is the responsibility of the Department for Transport.
Leonard Wats	son	
RR-0513	"Totally unacceptable amount traffic using Broadbottom as a rare run."	The Scheme is forecast to result in a reduction in traffic on Long Lane/Mottram Road through Broadbottom of up to 1,500 vehicles per day in 2025 and 550 vehicles per day in 2040, which equates to a 16% and 5.5% reduction compared to without the Scheme respectively.
RR-0543	"I have lived in this village since 1985, with a short break between 1988-1992. Thirty two years in total, after removing the 4 year break. I have the traffic increase over these years. It used to be that Monday-Friday, mainly during rush hours periods, the almost grid lock situations would be happening. But as the years have passed there is no longer any let up. This now only happens for specific reasons, Woodhead is closed, for acidents, roadworks or weather. The weekends are no longer quieter. The introduction of the 35A exit on the M1 and small Manchester sign, have contributed significantly to the increase in traffic through the village. If there are any problems on the M62, this increases the traffic along this route. There is a primary school on the main road, Market Street, the levels of pollution will no doubt effect the health of many, but specifically, children playing out exposed to traffic fumes, every break and lunch period. The houses on the Market Street are filthy, residents constantly need to clean their windows and doors due to the dirt and dust generated by this constant heavy and slow moving traffic.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley and reduces overall journey times across the appraised road network compared to without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys. The Scheme includes new controlled pedestrian crossing facilities at all new junctions, and at the existing Gun Inn Junction. Further safety measures have recently been installed on the A628 in Tintwistle. Further safety measures along the A628 corridor are also being considered but not as part of this scheme. Please see National Highways' response to the Relevant representation made by CPRE Lancashire, Liverpool City Region and Greater Manchester (RR-0169-2) in relation to air quality.



When I lived on Highfield Gardens, my daughter was run over at the age of 16 years, thrown into the air and landing onto the bonnet smashing the window screen at the point of contact with her head, outside the One Stop, then Healds, when the slow moving traffic, resulted in a vehicle pulling out of the queue, driving the wrong direction, onto the opposite/wrong side of the road to get outside the shop. The stationary traffic had resulted in a hgv driver kindly, leaving a very big space in front of his lorry and allowing her to cross, she was only looking to her left for oncoming traffic into the village heading out towards Woodhead, as expected. She did not expect a vehicle to come from her right out of the stationary queue, driving in the wrong direction on that side of the road. She is just one of many casulties in this village. I witnessed a child being run over on the pelican crossing outside the school, when a car failed to stop in time, when the lights were on red. It is appalling, that people have to put up with this situation day in, day out. And this will only get worse as the house building increases in Glossop, Hadfield and Tintwistle. Without the necessary infrastructure, they'll be longer, lengthier queues, many more numbers of people with health problems, many more casulties, pedestrians and drivers/passengers, and quality of life will deteriorate even more. Drastic action is required now, not

Maggie Deakin

later. As I write this another 52 houses are being built in Hollingworth. A large number of houses are being built on various new estates in Glossop. It's hard to believe the situation could be any worse, but inevitably all these new houses will increase the existing problem to worse than the current unbearable."

The Scheme includes new controlled pedestrian crossing facilities at all new junctions, and at the existing Gun Inn Junction. Further safety measures have recently been installed on the A628 in Tintwistle. Further safety measures along the A628 corridor are also being considered but not as part of this scheme.

Mike Chetham

RR-0606

"A completely superfluous link road. Unnecessary waste of money. Spend the money on the cross Pennine rail link. People drive because public transport is unreliable. Improve cross Pennine rail and you will take cars off this road. Improve the capacity of the cross Pennine rail link and goods could be carried by rail. By improving the rail link you reduce traffic, and improve air quality upon the important habitat of the peat moorlands of the Pennines. This might have been an appropriate solution 50 years ago when the idea was first mooted. Not now. No to the A57 link roads."

Proposals for improving passenger and rail connections were set out in the *Integrated Rail Plan for the North and Midlands*⁶ published by Department for Transport in November 2021. The proposed Scheme does not preclude any of these proposals.

Assessment of the air quality impacts of the Scheme at ecological receptors (designated sites) found no significant air quality effects due to the Scheme, including receptors within the internationally designated sites; Peak District Moors SPA and South Pennine Moors SAC, which cover large sections of the Pennines. See Chapter 5: Air quality, Section 5.9 of the Environmental Statement [APP-061] for further details.

Any significant effects on habitats within the Peak District relating to increases in air quality from the Scheme have been addressed within the Habitats Regulations Assessment Screening Report (APP-054). Any significant effects have been screened out.

⁶ https://www.gov.uk/government/publications/integrated-rail-plan-for-the-north-and-the-midlands



RR-0667-1	3. The 'Do Something' AADT figures show a 25% increase in traffic on M67 yet no significant increase for local roads which makes no sense. The figures indeed show significant reductions on Back Moor and Roe Cross and a slight reduction on Market Street Hollingworth with the scheme than without it. This scheme would make it more attractive for vehicles travelling from Stalybridge to the M67 to go through Mottram than to use Matley Lane. It would also attract more traffic to travel over Woodhead Pass and along Market Street Hollingworth.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the M67, A57, the A628 (Woodhead Pass), more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the M67, A57 and A628, which means that with the Scheme traffic flows on some roads are forecast to increase, including on the M67, the A628 and A57. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.
Paul Saunders		
		The traffic modelling does indicate that the Scheme will result in reductions in traffic flows on the A6018 Back Moor/Roe Cross (up to -22%) and on A628 Market Street (up to -2%).
		The traffic modelling also indicates that with the Scheme some traffic from Stalybridge wanting to travel west along the M67 does indeed re-route from Matley Lane to the M67 via the new link road.
RR-0667-2	4. There is an assumption within the scheme that there will be restrictions / calming on Hyde Road once it is detrunked. If this were to be implemented then it would encourage vehicles travelling from Stalybridge to the M67 to use Back Moor thereby increasing the traffic flow on Back Moor and encourage vehicles travelling from Broadbottom to the M67 to use Ashworth Lane.	Traffic modelling to assess the impact of the Scheme accounts for traffic calming on the de-trunked section of the A57 Hyde Road that includes a 20mph speed limit. The traffic modelling indicates that with the Scheme, including traffic calming on the A57 Hyde Road, traffic flows on the A6018 Back Moor/Roe Cross reduce by up to 22% compared to without the Scheme. The traffic modelling also indicates that the traffic flows on Ashworth Lane will reduce by up to 35% with the Scheme compared to without it.
RR-0667-3	6. There is no mention of the visual impact of the embankment to the North of Mottram Moor on the properties on Mottram Moor.	Figure 7.3 of the ES - Scheme Level Landscape Character [APP-092] indicates the scheme level landscape/townscape character areas that lie within the study area. Of those to the north of the Scheme associated with Mottram Moor are SLLCA 3 Mottram Moor Pasture, SLTCA 5 Mottram Moor and SLTCA 3 Mottram Sprout Green. A number of residential visual receptors were assessed in these areas.
		These are represented by Viewpoint 5 Old Hall Lane, Viewpoint 6 Court Road, Old Hall Lane, Back Lane / Lodge Court. and Viewpoint 10 adjacent to The Gunn Inn in Appendix 7.1 of the Environmental Statement (APP-166) Tables 1-1 and 1-2 and by ten viewpoints in Table 1-3.
		Of the ten viewpoints in Table 1-3, five are considered to have no discernible change (Viewpoints V-R-08 Dewsnap Lane, and V-R-22 to V-R-25 inclusive



		representing Rabbit Lane, Lumb Farm, Hard Times Farm and Thorncliffe Farm). For Viewpoint V-R-44 Hollingly Terrace the level of significance at construction is slight adverse but during operation is slight beneficial. For the remaining four viewpoints (V-R-13 Old Hall Lane, V-R-21 Mottram Old Hall, V-R-36 Mottram Moor and V-R-42 Nettle Hall) the cutting slopes were one factor considered in the assessment which contributed to a significant adverse effect on residential receptors during construction and at the opening year. At the summer of year 15, residential receptors at Old Hall Lane would have a moderate adverse effect. However, for all other receptors this would reduce to slight adverse in the summer of year 15 due to mitigation planting at the top of the cutting slopes and woodland/trees on the cutting slopes. Therefore, properties on Mottram Moor have been mentioned and assessed.	
RR-0667-4	7. For the first time in any document from Highways England there is mention of the noise pollution to the rear of the properties on the north of Mottram Moor from the embankment. The mitigation measure is 2.5m high noise barriers on the embankment, but there is no description of what these are.	Potential significant adverse effects from noise were identified from the Scheme at noise sensitive receptors close to the Mottram Moor Link Road, including properties at Carrhouse Lane. To reduce road traffic noise levels and avoid adverse significant effects at these locations, the proposed permanent environmental noise barriers on the Mottram Moor Link Road were incorporated into the design of the Scheme. The locations of the proposed permanent environmental noise barriers on the Mottram Moor Link Road are shown in Environmental Statement Figure 11.11 [APP-139] and the approximate lengths of the noise barriers are shown in Table 11.18 in Chapter 11 Noise and Vibration of the ES [APP-067]. The specification and material of the noise barriers would be determined during the detailed design of the Scheme, however, the noise barriers are likely to have a finish similar to a close-boarded fence to avoid visual impacts.	
RR-0667-5	8. Contrary to the statements made by Highways England during the public consultation there has been no consultation with the residence of the properties on Mottram Moor as to what will happen to the land at the front of our properties. Each time plans are brought forward the design for this area has changed. Indeed it is now unclear as to who will be responsible for the access roads here."	This issue was discussed with the Mottram Moor community group after the 2018 consultation and the Applicant is in ongoing discussion with the property owners/tenants since a similar issue was raised in the 2020 consultation. The current design reflects those discussions. Care will be taken around Mottram Moor and the Applicant is in ongoing discussion with Tameside MBC to agree the new parking provision. The existing sections of the A57 Mottram Moor, either side of the new crossing, will be retained as access for the properties on Mottram Moor and will not be a through route. Tameside MBC will have full input in determining the de-trunking measures and wish to involve the public in the final optioning process. This process could be carried out during the DCO process. The main parameters of a 20mph speed limit reduction will be fixed as part of the DCO process.	



Paul Waring		
RR-0671	3. The National Policies relating to climate change mitigation will not be strengthened, assisted or actioned in any way by this by-pass. There is no provision for the pedestrian or the cyclist let alone any thought given to the idea of bus-lanes.	Please refer to National Highways' response to the Relevant Representation of Trans Pennine Trail (RR-0879-1) with regards to improvements for walking and cycling. Please refer to National Highways' response to the Relevant Representation of CPRE Lancashire, Liverpool City and Greater Manchester (RR-0169-1) with regards national climate change policies. With the Scheme, bus services will continue to operate along the de-trunked section of the A57 and will not use the new link road. Consequently, bus services will benefit, in terms of both journey times and journey time reliability, from the removal of traffic congestion and delay on the de-trunked section of the A57 due to the Scheme and bus lanes are not, therefore, required.
Peter Simon		
RR-0698-2	1. On balance the scheme fails to establish a benefit that outweighs the considerable adverse impacts. In particular the scheme is unworkable with unsustainable impacts at its Eastern end due to increased traffic flows on a constrained road network.	The Case for the Scheme (CftS) (APP-182) demonstrates that the Scheme achieves a positive planning balance when weighing up impacts against the public benefits of the Scheme. Please see the response made by National Highways to the Relevant Representation made by Sharefirst my journey to school in relation to changes to traffic flows on the network (RR-0796-4).
RR-0698-5	4. Local Policy is also a consideration.	A summary of relevant local policy, including compliance with that policy, is set out in chapter 7 and Appendix A of the Case for the Scheme (APP-182). Under Section 104(3) of the Planning Act 2008, an application for Development Consent Order is required to be determined in accordance with the relevant National Policy Statement, except where the Secretary of State is satisfied one or more of the relevant clauses (Section 104 (4-8)) applies. Paragraph 1.17 of the NN NPS states that the NPPF will be an important and relevant consideration 'but only to the extent relevant to [the] project'. The Case for the Scheme adequately considers any such relevance and compliance with the following documents: NPPF Greater Manchester Joint Minerals Development Plan Document (2013) Tameside Unitary Development Plan (UDP 2004) (saved 2007) High Peak Adopted Local Plan 2016 (April 2016) Derby and Derbyshire Minerals Local Plan (adopted 2000 and amended in 2002) (saved policies).



		Paragraphs 7.3.18 and 7.3.19 of the Case for the Scheme conclude that The Scheme is considered to be aligned with local and regional planning policy and it is anticipated that the Scheme would also result in an improvement in community connectivity across the area.
RR-0698-9	8. PINS Advice note 17 informs the CftS assessment Section 6 Planning History etc but this is discretionary. I wish to suggest that the binding annual OAN new build quota within the plan period would be a particularly reliable indicator of planning "certainty" (eg for Glossopdale within High Peak Borough) and should have been included for a safe assessment of cumulative impact in any CftS and Environment Statement.	Objectively Assessed Need (OAN), now Local Housing Need, is a factor that is considered by the Local Planning Authority (LPA) when compiling their local plans for the area and translates the need into land provision. The Case for the Scheme (CftS) (APP-182) considered any relevant regional and local policy documents against the Scheme's alignment and is set out in Appendix A.
		The following local planning policy documents were considered relevant:
		Tameside Unitary Development Plan (UDP 2004) (saved 2007)
		High Peak Adopted Local Plan 2016 (April 2016)
		Derby and Derbyshire Minerals Local Plan (adopted 2000 and amended in 2002) (saved policies).
		The now-abandoned Greater Manchester Spatial Framework (GMSF) proposed 2,790 homes in TMBC, this included the Godley Green development. TMBC has recently submitted a planning application for Godley Green independently of work on the new Greater Manchester <i>Places for Everyone</i> plan, but at the time of writing (December 2021) the application had yet to be validated. Once validated National Highways will consider whether the application should be included in the "core scenario" of the traffic model.
		Chapter 15 Cumulative Effects (APP-071) has been prepared in accordance with PINS Advice Note 17. Furthermore, the Chapter 12: Population and Human Health of the ES (APP-068) considered it was prudent to continue to note allocations that were in the process of being made through the GMSF as part of its assessment as there was a chance that these allocations could be made in later plans through 'Places for Everyone' - a joint development plan for jobs, new homes and sustainable growth across the Greater Manchester boroughs.
		It concluded that if developments identified as being within the withdrawn GMSF are constructed and come into active use, it is expected that there will be an increase in the amount of traffic over and above the existing conditions. Without improvements that the Scheme will bring, the road network will become highly congested resulting in considerable delays. Therefore, the Scheme presents a beneficial impact on land use and accessibility and opportunity to support and facilitate development growth.
		Places For Everyone plan is undergoing statutory Regulation 19 consultation, the timescale for the adoption of Places for Everyone is currently uncertain but according to the Regulation 19 draft version submission of the plan to the Planning Inspectorate for examination "is likely to happen in summer 2022". Therefore, it currently carries limited weight in decision making, due to its relatively early stage of development.



Poppy Simon			
RR-0713	"I am writing to register my objection to the proposed A57 Link Roads and encourage the Examination to scrutinise the following issues. I believe the proposed benefits to Mottram will come at the expense of Glossopdale and Longdendale, as well as the Peak District at large. The scheme would increase traffic which in turn would increase air pollution, road traffic accidents and greenhouse gas emissions. The High Peak Borough Council has declared a Climate Emergency - investment should be focused on improving public transport and encouraging walking and cycling to reduce congestion rather than building a destructive new road through the Dark Peak, which was recently reported to be the most degraded upland environment in Europe. It also does not comply with national policies for climate change, and risks contravening national policy that requires trunk road traffic to go round National Parks as well. The scheme involves fragmentation, loss or displacement of diminshing wildlife habitats such as wet grazing meadows and of protected species, such as bats and barn owls. Local countryside, highly valued for its natural undeveloped character and open views, would be urbanised and the Green Belt would be cut in two. The peatlands of the Peak District are the UK's biggest carbon store, however, blanket bogs in poor condition release more carbon than they take in, therefore we should be restoring and protecting the moors of the National Park rather than further destroying it. Highways England should consider a lorry ban combined with sustainable transport options to protect the Peak District."	Please refer to National Highways' response to the Relevant Representation made by Derbyshire County Council in relation to road safety (RR-0240-6). Please see the response by National Highways to the Relevant Representation made by the Peak District National park authority in respect of carbon (RR-0677-13). The air quality assessment of the Scheme presented in Chapter 5: Air quality of the ES (APP-061) indicates that on balance there will be an overall improvement in air quality due to the Scheme and where there are any increases in concentrations these are not expected to result in any significant adverse effects with the Scheme. Moreover, a detailed assessment of the effect of the Scheme on designated ecological sites containing habitats sensitive to nitrogen deposition was undertaken. The assessment concluded that there would be no significant effects due to the Scheme at the designated sites identified within the study area. The Scheme will not result in the loss/damage of any peatland habitat and potential impacts arising from increase in traffic within the Peak District has been assessed (including any likely significant effects upon blanket bogs) within the Habitats Regulations Assessment Screening Report (APP-054) in full consultation with Natural England. Any likely significant effects have been screened out. Please see the response by National Highways to the Relevant Representation made by CPRE Peak District and South Yorkshire (RR-0170) in relation to the Green Belt.	,
RR-0721	"I object to the proposed Mottram Bypass. It will do nothing to relieve traffic congestion or improve the air quality in Tintwistle or Glossop. It will simply move the existing problem elsewhere. What our local area desperately needs is improvements to public transport. And HGV drivers should be encouraged to use a different route to cross the Pennines (the M62). Better still, the government needs to implement policies to divert freight from the road network to rail."	Please see the response by National Highways to the relevant representation made by CPRE Lancashire, Liverpool City Region and Greater Manchester (RR-0169-2) in relation to air quality. Please see the response by National Highways to the relevant representation made by Sharefirst my journey to School (RR-0796-4). Please see National Highways' response to the Relevant representation made by Derbyshire County Council in respect of re-routing traffic (RR-0240-6). The M67, A57, A628, A616 corridor is part of the Strategic Route Network for which National Highways is the highway authority. As such, this corridor is identified as being a suitable route for strategic, inter-regional and inter-urban traffic, including for all types of commercial traffic such as heavy good vehicles (HGVs). Consequently, the route is included in the National Primary Road Network that connects primary destinations across the UK and has green-backed direction signs.	RR-0336, RR-0467, RR-0674



Bonny Simon		The <i>Trans-Pennine Routes Feasibility Study Stage 2 Report</i> ⁷ published by the then Highways Agency in February 2015 considered two potential HGV control options: HGV Control Scheme (including complementary measures) and a Peak Period Only HGV Control Scheme (including complementary measures).	
Poppy Simon	p o to to o received and the control of the control	Whilst the HGV Control options were considered to be feasible, i.e. technically possible and satisfied the evaluation criteria for both key problems and objectives, including large beneficial impacts relating to safety objectives, ogether with beneficial impacts for environmental, societal and capacity objectives, connectivity was deemed to be adversely impacted, given the restriction on a specific mode of vehicle between Manchester and Sheffield Regions. Furthermore, whilst journey times for HGVs would be negatively impacted on, other users of the route would see a benefit (by reducing delays at junctions and on steep sections of the route). However, the key reason that these options were not progressed is that the measures were considered difficult to deliver, for a number of reasons. Stakeholder acceptability was canticipated to be an issue, given that the options would negatively impact on connectivity and associated economic growth, as well as increasing carbon emissions, given that HGVs would have to travel longer distances, such as via the M62. There could be a risk of objection to any.	RR-0336, RR-0467, RR-0674

 $[\]frac{7}{\text{https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/409036/trans-pennine-feasibility-stage-2-report.pd}$



RR-0737	"I wish to object to the A57 Link Roads scheme on the grounds that: 4. the stated economic benefits of the scheme are unclear. The BCR assessment also appears to be based on an out of date calculation of the scheme cost and, in any event, does not indicate a high cost / benefit ratio;	The monetised economic benefits of the scheme are forecast to be primarily derived from journey time savings achieved through reducing congestion along the A57 and through generation of increased economic growth in the area by providing better access to employment and connections between businesses. There will also be benefits from reduced levels of noise for residents of Mottram along the existing A57. The Benefit-Cost Ratio (BCR) of 2.45 is classed as high value for money (greater than 2), though the assessment of economic performance is based on more than just the BCR. The economic assessment is outlined in the Case for the Scheme (APP-182) and was undertaken through a cost benefit analysis (CBA) in line with DfT TAG and HM Treasury Green Book guidance. This compares the scheme cost (both capital and maintenance/renewal) against the projected monetised benefits and disbenefits to society that the scheme will offer such as travel time savings, accident reductions, environmental impacts and wider economic benefits. The CBA is calculated over an appraisal period which extends 60 years from the anticipated opening date, with all future costs and benefits discounted in line with the HM Treasury social time preference rate to calculate present values of costs and benefits. A benefit-cost ratio (BCR) is calculated, which along with any non-monetised impacts, are then used to determine a suitable value for money category for the scheme. The primary source of benefits for the scheme are transport user benefits.	RR-0182, RR-0762
		Environmental impacts of the scheme form a key part of the appraisal, which may include benefits and/or disbenefits. This includes the project impact on greenhouse gas emissions, air quality and noise levels. Other impacts assessed as part of the CBA include: accident analysis using DfT COBALT (cost and benefits to accidents – light touch) software; wider economic impacts where benefits are realised in secondary (nontransport) markets; and the impact on public finances through indirect taxation (fuel duty). The economic assessment is based on the assignment of a forecast Core Growth Scenario, with alternative sensitivity tests using Low Growth and Optimistic Growth assumptions for the volume of traffic using the Scheme (as aligned with TAG Unit M4 (Forecasting and Uncertainty). The Core Growth Scenario traffic forecast is based upon what is deemed the most likely land use and traffic growth assumptions for the route.	



Richard Leyshon

RR-0737

"I wish to object to the A57 Link Roads scheme on the grounds that:

4. the stated economic benefits of the scheme are unclear. The BCR assessment also appears to be based on an out of date calculation of the scheme cost and, in any event, does not indicate a high cost / benefit ratio;

The monetised economic benefits of the scheme are forecast to be primarily derived from journey time savings achieved through reducing congestion along the A57 and through generation of increased economic growth in the area by providing better access to employment and connections between businesses. There will also be benefits from reduced levels of noise for residents of Mottram along the existing A57. The Benefit-Cost Ratio (BCR) of 2.45 is classed as high value for money (greater than 2), though the assessment of economic performance is based on more than just the BCR.

The economic assessment is outlined in the Case for the Scheme (APP-182) and was undertaken through a cost benefit analysis (CBA) in line with DfT TAG and HM Treasury Green Book guidance. This compares the scheme cost (both capital and maintenance/renewal) against the projected monetised benefits and disbenefits to society that the scheme will offer such as travel time savings, accident reductions, environmental impacts and wider economic benefits. The CBA is calculated over an appraisal period which extends 60 years from the anticipated opening date, with all future costs and benefits discounted in line with the HM Treasury social time preference rate to calculate present values of costs and benefits. A benefit-cost ratio (BCR) is calculated, which along with any non-monetised impacts, are then used to determine a suitable value for money category for the scheme.

The primary source of benefits for the scheme are transport user benefits.

Environmental impacts of the scheme form a key part of the appraisal, which may include benefits and/or disbenefits. This includes the project impact on greenhouse gas emissions, air quality and noise levels.

Other impacts assessed as part of the CBA include: accident analysis using DfT COBALT (cost and benefits to accidents – light touch) software; wider economic impacts where benefits are realised in secondary (non-transport) markets; and the impact on public finances through indirect taxation (fuel duty).

The economic assessment is based on the assignment of a forecast Core Growth Scenario, with alternative sensitivity tests using Low Growth and Optimistic Growth assumptions for the volume of traffic using the Scheme (as aligned with TAG Unit M4 (Forecasting and Uncertainty). The Core Growth Scenario traffic forecast is based upon what is deemed the most likely land use and traffic growth assumptions for the route.

RR-0182, RR-0762



Roger Barrett

RR-0762

"Previously I have supported the application, but on examining the information contained in '6.5 Environmental Statement Appendix 2.1 Traffic Data' I now am very much against the bypass going ahead. Highways England's traffic data shows that, although there are very local improvements in the traffic levels following the bypass's construction, ie at Mottram Moor, there are very significant increases in traffic levels in many surrounding areas, in particular within Glossop and specifically on Dinting Road where my family and I live. Dinting Road will see an increase in traffic of 46% (1,500 extra vehicles per day), post bypass and several other areas of Glossop will see similar, or worse increases (for example Brookfield sees an increase of 31%, or 4,950 vehicles per day). Even now without the bypass, Dinting Road (along with much of Glossop), suffers from significant traffic issues (volume and speed). An additional 46% of volume on this already struggling road is not something we wish to see and many other areas of Glossop will also suffer. Rather than solving the wider traffic problem, the bypass simply moves it elsewhere at a cost of £200m+. A further concern is that the bypass is being seen by our elected representatives as a magic bullet that solves the area's traffic problems. As a demonstration of this, High Peak's MP, a supporter of the bypass, is campaigning for no new housing in Glossopdale until the bypass is built. This is illogical, given that traffic levels will be increased in Glossopdale by the bypass. Unfortunately, the case for improving the area's traffic has been simplified down to spending a vast sum of public money on a bypass which benefits a small area at the expense of creating much wider problems. The area's traffic problems are far more complex and, unfortunately, appear to be being ignored – perhaps because building an expensive bypass is relatively easy and politically looks impressive. I would like to register myself as an interested party because the safety of the road I live on will be directly and adversely impacted."

The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57, the A628 through Tintwistle and some other roads, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57, A628 and some other roads, which means that with the Scheme traffic flows on some roads are forecast to increase. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it.

However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.

The Scheme is forecast to result in an increase in traffic on Dinting Road and Shaw Lane. This route is currently a well-known and well-used alternative to the A57 through Glossop. This is because of traffic congestion and delays on Glossop High Street at certain times of day. The scheme itself is not introducing any specific measures on this part of the network that would modify this traffic behaviour. The resulting forecast increase in traffic by 2040 on Dinting Road due to the Scheme is up to 1,600 vehicles per day (+50%) and on Shaw Lane it is up to 1,000 vehicles per day (+14%.) However, the absolute increases in traffic flow are forecast to be relatively low at up to 91 vehicles per hour (less than 1 vehicle per minute each way) on Shaw Lane and up to 159 per hour on Dinting Road (less than 1 vehicle every 45 seconds each way).

Traffic Regulation Order given the constraint on connectivity and likely increase in travel costs associated with the increased distances HGVs would need to travel. Public acceptability is also was also considered to be a potential issue, despite support from residents along the A628, objections are likely from members of the public residing on routes where HGVs are displaced to. The options could place an increased burden and ongoing cost on police/trading standards, who may be required to enforce such an option, particularly given that the ban areas may cross many administrative boundaries. Finally, there could be an increased maintenance liability for local highway authorities, associated with any de-trunking of the A628 and increased HGV movements on the local network.

Therefore, it is not appropriate to restrict access for HGVs along the M67, A57, A628, A616 corridor. Restricting access for HGVs on other roads within the Peak District National Park would be the responsibility of Derbyshire County Council as the highway authority for these roads, rather than for National Highways to consider.



Sheila Saund	Sheila Saunders			
RR-0803-1	3. I cannot understand where some of the traffic flow figures have come from. There seem to be discrepancies between those given by H. E. and those published by Department of Transport.	The forecast traffic flows presented in the Transport Assessment Report (APP-185) and Appendix 2.1 of the Environmental Statement (APP-151) have been taken from the outputs of the strategic traffic modelling undertaken to assess the traffic impacts of the Scheme.		
RR-0803-2	4. I believe the plans do not successfully support the Scheme Objectives. Re: TR010034-000112 Connectivity and Societal: local community connectivity will not be significantly altered in Tintwistle and Hollingworth since the hold-up seems to be Jollies corner traffic lights in Mottram village. Residents on Mottram Moor and Back Moor, Mottram will be subject to more traffic using Back Moor. Capacity: The A628 goes to Barnsley and north and central Yorkshire, not just north Sheffield. The A57 Snake Pass is not good for HGVs. There is further development planned for the Westwood roundabout which I haven't seen mentioned. This bypass will take increasing traffic diverted from M62 when that route has problems. Capacity and Environmental: The loss of Roe Cross roundabout access to the bypass and TMBC plan to reduce Hyde Road speed limit will increase traffic flow on Back Moor as traffic accesses M67. Residents at the junction of Back Moor and Mottram Moor will see very little improvement but potentially worsening of living conditions.	The Scheme improves journey times and reduces both traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make routes, including the A57 and the A628 through Tintwistle, more attractive for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes, including onto the A57 and A628, which means that with the Scheme traffic flows on some roads are forecast to increase, including on the A57 and the A628. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.		
		Traffic modelling to assess the impact of the Scheme accounts for traffic calming on the de-trunked section of the A57 Hyde Road that includes a 20mph speed limit. The traffic modelling indicates that with the Scheme, including traffic calming on the A57 Hyde Road, traffic flows on the A6018 Back Moor/Roe Cross reduce by up to 22% compared to without the Scheme. The A57 Link Roads Scheme forms part of a wider suite of Southern Trans-Pennine improvements, along with increasing capacity at A61 Westwood		
		roundabout and carrying out technology improvements along the A628. However Westwood roundabout and technology improvements on the A628 were not considered to be an NSIP and brought forward in March 2020 as two separate schemes under Permitted Development rights.		
Stephen Bagshaw				
RR-0818-1	Loss of Open Access Land	The Scheme will not result in the loss of open access land. There are a number of PRoWs within the Order limits. Chapter 12: Population and Human Health of the Environmental Statement (APP-068) assesses the likely effects on PRoWs during construction and operation and concludes that there will be no permanent, significant or negative effects.		



RR-0818-2	3. Threat to PDNP. A Trojan Horse for a Motorway by stealth	This Scheme is part of a programme of three projects to deliver improvements along the South Trans-Pennine route between Manchester and Sheffield to improve journeys and safety for the thousands of drivers who use them every day. The other projects, being undertaken separately to the Scheme, are the A61 Westwood roundabout and A628 technology improvements.
RR-0818-3	8. Air quality, vibration, light and noise pollution set to worsen in many affected areas.	In terms of potential light pollution on visual receptors (people), a high-level night time assessment was undertaken in accordance with Design Manual for Roads and Bridges (DMRB) LA107 Landscape and Visual Effects. As set out in Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063) six viewpoints were selected for the assessment, as follows:
		VP 1 – View from Edge Lane adjacent Grange Farm (PRoW LON/46 & PRoW LON/49); VP 4 – Roe Cross Road (A6108); VP 6 – Coach Road (PRoW LON/108); VP 8 – View from PRoW LON/86 & LON/87 junction (adjacent to the Church of St Michael and All Angels); VP 14 – View from Trans Pennine Trail (NCN 62, PRoW HP12/175/5); and VP 16 – View from PRoW LON/41.
		Viewpoints were selected to be representative of views and landscape effects along the route at intervals mostly likely effected by change to the night view. The viewpoints were considered likely to best demonstrate the night-time effects through previously unlit areas along the whole of the Scheme route.
		Overall, it was considered that the likely night-time effects, as a result of increased levels of light, would cause slight damage to the existing night-time character at a local level as a result of increases in the sources of light within the landscape.
		The proposed Scheme lighting and vehicle headlights would result in night-time effects on views. New effects (beyond the existing highway infrastructure) would be most apparent around in areas previously unlit. This included the section from the M67 Roundabout (adjacent to Grange Farm) to Roe Cross Road (A6108), adjacent to Hurstclough Brook, represented by viewpoint 1 and 4. It also includes a section represented by viewpoint 6 from Old Hall Lane to Mottram Moor Junction; and from Mottram Moor to Woolley Bridge (along the Etherow Valley), represented by viewpoint 8 and 14. The lighting design would seek to minimise obtrusive light pollution as part of embedded mitigation.
		Of the six viewpoints selected for night time assessment, five had a moderate adverse effect in winter of year one as set out in Appendix 7.1 of the Environmental Statement (APP-166), Table 1-2. Viewpoint 4 Roe Cross Road has a moderate adverse effect at the summer of year 15.



RR-0818-4	13. Transforms Mottram from a semi-rural community to an urbanised mass of concrete.	The effect on Mottram townscape character was considered not to have a significant residual effect as follows. The landscape character has been assessed. It is set out within Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063), Table 7.26 Effects on Landscape and Townscape Character Areas [APP-063] where the key characteristics of each landscape and townscape character type was described and the magnitude of change upon them was given. For SLTCA 3, the key characteristics are a mix of 19th century post war development with clusters of modern estates interspersed with older buildings and the influence of the A6018. The sensitivity was medium. The effect of construction was large adverse. The winter of year one was moderate adverse but with mitigation in place this reduced to slight adverse in summer of year 15.	RR-0906
RR-0818-5		For SLTCA 4, the key characteristics are high density late medieval village core and the sensitivity is high. The effect at construction was slight adverse. With mitigation in place, this reduced to slight beneficial during operation at both winter of year 1 and summer of year 15. Furthermore, the Environmental Masterplan (APP-074) has been developed to help integrate the new link road into the surrounding landscape to reduce the visual impact by screening views of the Scheme.	
Stephen York			
RR-0830-1	1 While the current traffic problems at Mottram will be eased there will be a significant increase in traffic in Glossopdale, Woodhead Road and the Snake Pass.	1. The Scheme improves journey times along the A57 and the A628 and as a result it is forecast that some traffic will reroute from alternative routes across the Pennines to take advantage of this. Consequently, the Scheme is forecast to result in an increase in traffic using the A57 Snake Road and the A628 Woodhead Road through the Peak District National Park, as well as some roads in Glossopdale. However, the Scheme overall is forecast to deliver journey time savings across the appraise road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.	



RR-0830-2	2 This increase in traffic will inevitably generate poor air pollution affecting more people than now.	2. An air quality assessment for the Scheme has been undertaken in accordance with latest best practice as set out in Highways England Design Manual for Roads and Bridges (DMRB) LA 105 Air quality standard. A detailed assessment, including air quality modelling has been undertaken for all areas where increases and decreases in traffic flow and congestion are expected to exceed a certain level. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The traffic change criteria were applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A57 through Glossop and the A57 and A628 across the Pennines. The traffic change criteria are not exceeded for the A57 between the Dinting Vale junction with the A626 Glossop Road and the junction with Ellison Street in central Glossop nor on the A628 Woodhead Road in Tintwistle. The A57 Snake Road and a number of roads in Glossopdale are however included in the study area (as defined by the ARN). The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP-076). Sensitive receptors located outside the air quality study area have not been included in the air quality assessment as where traffic change criteria are not exceeded this indicates that there would not be a significant adverse effect on air quality due to the Scheme in these locations. Where sensitive receptors are located within 200m of the ARN, as they are on several roads in Glossopdale, they have been included in the air quality assessment. The air quality assessment of the Scheme presented in Chapter 5: Air quality of the Environmental Statement (APP-061) indicates that on balance there will be an overall improvement in air quality due to the Sche	
RR-0830-3	3 There is likely to be an increased risk of road accidents due to the increased traffic in areas of complex and inadequate road networks.	3. Please see the response by National Highways to the Relevant Representation made by Derbyshire County Council in relation to road safety (RR-0240-6).	



Yasir Hayat			
RR-0905	"I am opposed to the plans. While there are lots of people who would like to see traffic issues resolved, I do not think this is the right way to do it. There are many people who live in the Glossop and Mottram areas because of the natural beauty of the area. I along with many others do not want to see this destroyed in order to build new roads which will lead to more traffic. I also do not believe the consultation was conducted fairly and properly. It should not have been held during the COVID-19 pandemic and should have been delayed. Many people who will be affected by the scheme were not given a fair opportunity to have their say as they were dealing with the impacts of the virus. I believe the scheme was preconceived with little attention given to viable alternatives. The information provided by Highways England is not in a format that is easily digestible by the general public. It does not set out clear aims and does not provide any evidence that it will work."	Please refer to the Relevant representation made by Stephen Bagshaw (RR-0818-4) in relation to landscape effects. Please see the response by National Highways the Relevant Representation made by Friends of the Trans Pennine Trail (RR-0282-5) in relation to the alternatives assessed. Please refer to the Relevant representation made by Iram Younis (RR-0346) in relation to the adequacy of consultation.	
Zakida B			
RR-0906	"I am against this scheme for the following reasons: 1. It would be the start of a new expressway across the Peak District National Park to South Yorkshire, driving more traffic across this beautiful area and devastating its strongly protected landscapes.	This Scheme is part of a programme of three projects to deliver improvements along the South Trans-Pennine route between Manchester and Sheffield to improve journeys and safety for the thousands of drivers who use them every day. The other projects, being undertaken separately to the Scheme, are the A61 Westwood roundabout and A628 technology improvements.	RR-0208, RR-0326, RR-0409, RR-0762, RR-0881

Part 8 – Representations in support of the Scheme



Representation Issue	National Highways Response	Representations this applies to
Relevant Representations made in support of the Scheme	Thank you for taking the time to support this Scheme. Your support is very much appreciated. You are able to continue participating in the examination by following it through the Planning Inspectorate website.	RR-0002, RR-0004, RR-0005, RR-0006, RR-0007, RR-0008, RR-0010, RR-0011, RR-0011, RR-0012, RR-0013, RR-0014, RR-0015, RR-0016, RR-0017, RR-0018, RR-0019, RR-0020, RR-0021, RR-0022, RR-0024, RR-0026, RR-0027, RR-0028, RR-0030, RR-0031, RR-0032, RR-0033, RR-0034, RR-0036, RR-0037, RR-0038, RR-0039, RR-0040, RR-0041, RR-0042, RR-0043, RR-0044, RR-0045, RR-0046, RR-0047, RR-0061, RR-0052, RR-0053, RR-0055, RR-0056, RR-0057, RR-0059, RR-0060, RR-0061, RR-0063, RR-0065, RR-0066, RR-0067, RR-0068, RR-0077, RR-0079, RR-0072, RR-0073, RR-0075, RR-0076, RR-0077, RR-0078, RR-0079, RR-0082, RR-0083, RR-0084, RR-0086, RR-0087, RR-0098, RR-0099, RR-0091, RR-0092, RR-0093, RR-0094, RR-0096, RR-0097, RR-0098, RR-0099, RR-0101, RR-0102, RR-0117, RR-0108, RR-0107, RR-0108, RR-0111, RR-0114, RR-0117, RR-0119, RR-0120, RR-0130, RR-0134, RR-0135, RR-0136, RR-0137, RR-0138, RR-0120, RR-0130, RR-0141, RR-0144, RR-0145, RR-0145, RR-0146, RR-0144, RR-0145, RR-0146, RR-0147, RR-0148, RR-0149, RR-0150, RR-0151, RR-0152, RR-0153, RR-0156, RR-0166, RR-0166, RR-0166, RR-0167, RR-0175, RR-



Representation Issue	National Highways Response	Representations this applies to
		DD 0204 DD 0205 DD 0206 DD 0200 DD 0404 DD 0402
		RR-0394, RR-0395, RR-0396, RR-0398, RR-0399, RR-0401, RR-0402, RR-0403, RR-0405, RR-0406, RR-0408, RR-0410, RR-0411, RR-0412, RR-0413, RR-0414, RR-0416, RR-0417, RR-0418, RR-0419, RR-0420, RR-0421, RR-0422, RR-0423, RR-0424, RR-0425, RR-0426, RR-0427, RR-0428, RR-0429, RR-0430, RR-0431, RR-0432, RR-0435, RR-0435, RR-0439, RR-0440, RR-0441, RR-0443, RR-0445, RR-0459, RR-0451, RR-0465, RR-0455, RR-0466, RR-0457, RR-0458, RR-0459, RR-0460, RR-0462, RR-0463, RR-0464, RR-0465, RR-0468, RR-0470, RR-0471, RR-0473, RR-0474, RR-0475, RR-0476, RR-0477, RR-0480, RR-0481, RR-0482, RR-0483, RR-0484, RR-0486, RR-0487, RR-0489, RR-0499, RR-0499, RR-0500, RR-0501, RR-0502, RR-0503, RR-0504, RR-0505, RR-0508, RR-0509, RR-0501, RR-0502, RR-0503, RR-0504, RR-0505, RR-0508, RR-0509, RR-0510, RR-0511, RR-0515, RR-0527, RR-0529, RR-0530, RR-0531, RR-0520, RR-0534, RR-0535, RR-0536, RR-0537, RR-0538, RR-0539, RR-0541, RR-0544, RR-0545, RR-0566, RR-0566, RR-0567, RR-0567, RR-0566, RR-0567, RR-0568, RR-0566, RR-0567, RR-0569, RR-0561, RR-0568, RR-0566, RR-0567, RR-0568, RR-0569, RR-0561, RR-0568, RR-0566, RR-0567, RR-0568, RR-0569, RR-0561, RR-0568, RR-0569, RR-0561, RR-0568, RR-0566, RR-0567, RR-0568, RR-0568, RR-0569, RR-0561, RR-0568, RR-0569, RR-0561, RR-0562, RR-0561, RR-0562, RR-0561, RR-0661, RR-0662, RR-0663, RR-0664, RR-0665, RR-0666, RR-0666, RR-0668, RR-0669, RR-0661, RR-0661, RR-0661, RR-0662, RR-0666, RR-0666, RR-0668, RR-0669, RR-0661, RR-0661, RR-0662, RR-0668, RR-0669, RR-0661, RR-0670, RR-0711, RR-0711, RR-0714, RR-0714, RR-0714, RR-
		RR-0740, RR-0741, RR-0742, RR-0743, RR-0744, RR-0745, RR-0746,
		RR-0747, RR-0748, RR-0749, RR-0752, RR-0753, RR-0754, RR-0755,
		RR-0756, RR-0757, RR-0758, RR-0759, RR-0761, RR-0763, RR-0764, RR-0765, RR-0766, RR-0768, RR-0769, RR-0770, RR-0771, RR-0772, RR-0772, RR-0773, RR-
		RR-0777, RR-0778, RR-0779, RR-0780, RR-0781, RR-0782, RR-0784, RR-0785, RR-0786, RR-0787, RR-0788, RR-0789, RR-0790, RR-0797, RR-0799, RR-0802, RR-0804, RR-0805, RR-0806, RR-0807, RR-0808,



Representation Issue	National Highways Response	Representations this applies to
		RR-0809, RR-0810, RR-0811, RR-0812, RR-0813, RR-0816, RR-0817, RR-0819, RR-0820, RR-0821, RR-0822, RR-0823, RR-0825, RR-0826, RR-0827, RR-0828, RR-0829, RR-0831, RR-0832, RR-0833, RR-0834, RR-0835, RR-0836, RR-0837, RR-0838, RR-0839, RR-0840, RR-0841, RR-0843, RR-0844, RR-0845, RR-0846, RR-0847, RR-0850, RR-0851, RR-0853, RR-0854, RR-0855, RR-0856, RR-0857, RR-0859, RR-0862, RR-0863, RR-0864, RR-0865, RR-0866, RR-0867, RR-0868, RR-0869, RR-0871, RR-0872, RR-0873, RR-0874, RR-0877, RR-0878, RR-0881, RR-0882, RR-0883, RR-0884, RR-0885, RR-0886, RR-0888, RR-0889, RR-0890, RR-0891, RR-0893, RR-0894, RR-0895, RR-0896, RR-0897, RR-0898, RR-0899, RR-0900, RR-0902, RR-0903, RR-0904, RR-0908, RR-0909,

© Crown copyright (2021).

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/ write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email psi@nationalarchives.gsi.gov.uk.

Printed on paper from well-managed forests and other controlled sources.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ National Highways Limited registered in England and Wales number 09346363