



**Application by Highways England for an Order Granting Development Consent for the A57 Link Roads Scheme**

**The Examining Authority's first written questions and requests for information**


**Response on Behalf of Derbyshire County Council**

## The draft Development Consent Order (dDCO) and other consents

Reference is made to the dDCO submitted by the Applicant for Deadline 1 [[REP1-041](#)].

No.	Reference	Question	Derbyshire County Council Response
1.4	Other consents Updates	<p>a) Please provide an up-to-date position in respect of obtaining the necessary consents, licenses, and agreements.</p> <p>b) Is there any reason to believe that any relevant necessary consents, licenses, and agreements will not subsequently be granted?</p> <p>c) Where appropriate, can letters of no impediment be provided by the Environment Agency and Natural England?</p> <p>d) Please could a summary of progress in securing other consents be provided at each relevant Examination deadline?</p>	<p>b) No. Derbyshire County Council would anticipate that with appropriate discussion and negotiation with the applicant, all necessary consents, licences and agreements for which Derbyshire County Council has responsibility, would be granted (see more detailed comments below to other questions where appropriate).</p>
1.15	Article 10 Street Works	<p>Are provisions required to resolve a potential conflict between the Applicant's ability to enter any street within the Order Limits with the ability of a local highway authority to perform its duties?</p>	<p>Derbyshire County Council operates a permit scheme for those undertaking street works. Whilst the applicant can enter any street, it is hoped that coordination is carried out to avoid any conflicts. Any advanced notice in terms of the works are essential and pre-start meetings would be advantageous. A 3-month notice of works would be advantageous to allow the County Council to coordinate with any other undertakers.</p>

No.	Reference	Question	Derbyshire County Council Response
			Contacts – Paul Jameson, James Adams and Sophie Wardle at DCC
1.17	Article 12(5) Construction and maintenance of new, altered or diverted streets and other structures Responsibility for maintenance	a Is each relevant local highway authority content to maintain the listed works at their expense? b Are the definitions of “ <i>works above the structure</i> ” and “ <i>the structure</i> ” in Article 12(5)(b) clear and unambiguous?	It is not believed Derbyshire County Council are being asked by the applicant to maintain any highway structures that will be constructed as part of the works. The River Etherow bridge will be on the county boundary but Tameside MBC have agreed to maintain this along with the other structures referred to.  The Inspector’s attention is drawn to 3.23(a) and (b) below. Derbyshire County Council have not at the time of writing agreed to maintain the carriageway, traffic signals, street lighting or to undertake winter maintenance for the section(s) of highway in Derbyshire. However, it is anticipated that this could be resolved by means of further consultation both during and before detailed design together with, where appropriate, commuted sums.
1.19	Article 14(6) Temporary alteration,	This provision confers deemed consent if the street authority does not respond within 28 days (a “ <i>guillotine</i> ”). The ExA would like to find the right balance between avoiding unnecessary delay to the	(a) For National Highways to consider. (b) The use of the correct channels for processing either temporary traffic signals applications, diversionary

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	diversion, prohibition and restriction of the use of streets Deemed consent	<p>Proposed Development and ensuring that appropriate regard is given to the interests and advice of other parties.</p> <p>a) Please could the Applicant provide evidence that the guillotine has been discussed with each relevant street authority and provide any comments that they have made on their ability to comply.</p> <p>b) Please could the street authorities comment?</p> <p>c) The ExA is minded that a provision be added for any application for consent to contain a statement drawing the street authority's attention to the guillotine. Please could the Applicant and the street authorities comment?</p>	<p>routes or temporary traffic regulation orders would be appreciated, in terms of the County Council's existing street works permit scheme. If it could also be brought to the attention of the street works coordinator at the County Council. Contact</p> <p></p> <p>(c) This is essential to ensure good communication with other statutory undertakers and our own council works.</p>
1.21	Article 18(11) Traffic regulation Deemed consent	<p>This provision confers deemed consent if the traffic authority does not respond within 28 days (a "guillotine"). The ExA would like to find the right balance between not unnecessarily delaying the Proposed Development and ensuring that appropriate regard is given to the interests and advice of other parties.</p> <p>a) Please could the Applicant provide evidence that the guillotine has been discussed with each relevant street authority and provide any comments that they have made on their ability to comply.</p> <p>b) Please could the traffic authorities comment?</p>	<p>(a) For National Highways to consider</p> <p>(b) It would be useful to coordinate the introduction of the new side road for the intended link road off the existing A57 Woolley Bridge. This will inevitably require a temporary signals application to build the new road and to facilitate the new traffic signals at the new junction. Early involvement of Derbyshire County Council, ideally before 28 days would be appreciated to enable coordination. Consideration of pre-start meetings would be essential.</p>

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		c) The ExA is minded that a provision be added for any application for consent to contain a statement drawing the traffic authority's attention to the guillotine. Please could the Applicant and the traffic authorities comment?	(c) The County Council would welcome applications or intentions at an early stage.
1.24	Article 21(6) Authority to survey and investigate the land Deemed consent	<p>This provision confers deemed consent if an authority does not respond within 28 days (a "guillotine"). The ExA would like to find the right balance between not unnecessarily delaying the Proposed Development and ensuring that appropriate regard is given to the interests and advice of other parties.</p> <p>a) Please could the Applicant provide evidence that the guillotine has been discussed with each relevant authority and provide any comments that they have made on their ability to comply.</p> <p>b) Please could the authorities comment?</p> <p>c) The ExA is minded that a provision be added for any application for consent to contain a statement drawing the authority's attention to the guillotine. Please could the Applicant and the authorities comment?</p>	<p>b) No discussion has taken place thus far between National Highways and Derbyshire County Council on the guillotine issue. However, 28 days would appear to be a reasonable and proportionate period within which the County Council would be required to provide any comments on the authority to survey and investigate any land within the County Council's ownership.</p> <p>c) Yes the inclusion of such a statement would appear be beneficial for clarity and for the avoidance of doubt.</p>
1.28	Article 39 Trees subject to tree preservation orders	Should the undertaker be required to consult with the relevant planning authority prior to felling, lopping and/ or replacing any tree subject to a tree preservation order?	It would be beneficial if the undertaker was to consult with the relevant local planning authority to ensure that it is clear which trees are directly affected by the proposal particularly given that the LPA are likely to be the body that has to field any questions from the public.

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1.32	Requirements 3-11 Provisions for consultation and agreement	Please identify where it would be helpful, for example to bring clarity or to help avoid any later misunderstandings, for specific provisions to be included in any Requirement for consultation or agreement to be required with relevant bodies. In each case, please explain why the provisions should be included.	Derbyshire County Council considers that Requirements 3 to 11 appear to be clear on which Requirements should be subject to consultation with each appropriate body, particularly local planning authorities, the Highways Authority and Lead Local Flood Authorities in the case of the Derbyshire County Council. In Derbyshire County Council's experience of the discharge of Requirements for another DCO highway scheme, this can also be clarified, if necessary, at an early stage through discussions with the applicant after the DCO has been granted.
1.33	Requirement 4(1) and (2) Second Iteration EMP	<ul style="list-style-type: none"> <li>a) Should there be a requirement for consultation on the second iteration EMP with the local highway authorities and the Environment Agency, as well as with the relevant planning authority?</li> <li>b) To give certainty that the measures identified in the ES are secured, should the second iteration EMP be required to incorporate the measures for the construction stage referred to in the ES as being incorporated in the EMP?</li> <li>c) Should there be a requirement for the second iteration EMP to contain a record of the consents, commitments and permissions resulting from liaison with statutory bodies?</li> </ul>	<ul style="list-style-type: none"> <li>a) Yes. This will provide the County Council with more certainty and clarity if any amendments are made to the First Iteration and would provide the opportunity for the County Council as Highway Authority to comment accordingly.</li> <li>b) Yes. This would appear to be beneficial and to provide more certainty that the measures in the ES would be implemented.</li> <li>c) Yes. This would appear to be beneficial so that each statutory</li> </ul>

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		d) Should there be a requirement for the second iteration EMP to be kept up to date with any material changes during construction and for consultation to be required on those changes?	body is aware of any consents granted by another statutory body. d) Yes. This will provide the County Council with more certainty and clarity if any amendments are made to the First Iteration and would provide the opportunity to comment accordingly.
1.34	Requirement 4(2)(c) Second Iteration EMP Working hours	<p>a) Please could the Applicant provide an explanation as to why each activity (i) to (ix) cannot be carried out during the specified working hours?</p> <p>b) Should the following be added after Requirement 4(2)(c):</p> <p><i>"Provided that written notification of the extent, timing and duration of each activity is given to relevant local authorities in advance of any works that are to be undertaken outside of the specified hours, except for any emergency works, which are to be notified to the relevant local authorities as soon as is practicable."</i></p> <p><i>"Any other work carried out outside the specified working hours or any extension to the working hours will only be permitted if there has been prior written agreement of the relevant environmental health officer and provided that the activity does not give rise to any materially new or materially worse environmental effects in comparison with those reported in the environmental statement."</i></p>	B) Yes. It is more likely to be either Derbyshire County Council and/or High Peak Borough Council that will receive any complaints from the public about any working on the scheme outside authorised hours set out in the DCO. Prior notification will be important, therefore, so that the County Council is aware of any such works and can make the public aware accordingly.

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1.35	Requirement 4(4) and 4(5) Third Iteration EMP	<p>a) Should there be a requirement for the third iteration EMP to be submitted to and approved in writing by the Secretary of State?</p> <p>b) Should there be a requirement for consultation on the third iteration EMP with relevant planning authorities, the local highway authorities and the Environment Agency?</p> <p>c) To give certainty that the measures identified in the ES are secured, should the third iteration EMP be required to:</p> <ul style="list-style-type: none"> <li>• be substantially in accordance with the measures for the management and operation stage first iteration EMP; and to</li> </ul> <p>incorporate the measures for the management and operation stage referred to in the ES as being incorporated in the EMP?</p>	<p>a) No comments.</p> <p>b) Yes. This would appear to be beneficial so that the County Council is aware of any significant amendments to the second iteration of the EMP and particularly as the third iteration will contain details of maintenance, monitoring and aftercare matters.</p> <p>c) Yes. This appears to be logical for consistency reasons so that the scheme is implemented largely in accordance with the First Iteration of the EMP approved as part of the granting of the DCO.</p>
1.36	Requirement Landscaping Landscaping scheme	<p>1. Please could the Applicant advise whether "otherwise" should be deleted from the first sentence of requirement 5(1)?</p> <p>2. Should it be required for the landscaping scheme to be approved before any part of the authorised development commences?</p> <p>3. With reference to Requirement 5(3), should the landscaping scheme be required to include details of hard surfacing materials?</p>	<p>Ideally the landscape scheme would and should be approved prior to the commencement of the works to ensure that the works make provision for the approved landscaping. Too many times landscape proposals have to be amended because the site hasn't been left in an appropriate condition for landscaping. Agreeing soft landscape details is more important than hard landscaping but ideally both should be agreed.</p>



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1.37	Requirement 5 Landscaping "Illustrative environmental masterplan"	Requirement 5(2) refers to an "illustrative environmental masterplan". a) Please could that document be submitted to the Examination? b) Should a definition be added to Requirement 1? c) Should it be added to Schedule 10?	No comments.
1.38	Requirement 5 Landscaping "other recognised codes of good practice"	Requirement 5(4) refers to "other recognised codes of good practice". Should this be made more precise, to ensure that the appropriate standard of landscaping is delivered?	Yes – it would be helpful to have all 'recognised codes of good practice' identified at the outset particularly those relating to soil handling, ground preparation, plant handling and planting.
1.41	Requirement 8 Surface and foul water drainage	Should there be a requirement for the relevant planning authority, local highway authority and/ or the Environment Agency to be consulted on written details of the surface and foul water drainage system?	Yes. In Derbyshire County Council's experience of dealing with the discharge of Requirements for another DCO highways scheme, this has been beneficial to the County Council in its role as Highway Authority and Lead Local Flood Authority.
1.42	Requirement 9(2) Flood risk assessment	a) Should any works otherwise in accordance with the flood risk assessment require the relevant lead local flood authority to be satisfied, as well as the Environment Agency? b) Are the Environment Agency and lead local flood authorities content that works do not need to	a) Yes. b) Yes.

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		carried out in accordance with the flood risk assessment if all affected landowners accept the predicted exceedances of flood levels?	
1.43	Requirement 10 Archaeological Remains	Should requirements be added for: a) any matters to be consulted and/ or agreed in writing with the Secretary of State or the County Archaeologist; b) any programme of archaeological reporting, post excavation and publication to be consulted on and/ or agreed in writing; and/ or for c) suitable resources and provisions for long term storage of any archaeological archives to be consulted on and/ or agreed in writing?	a) Yes b) Yes c) Yes
1.44	Requirement 12(1) Details of consultation Minimum period	Should a minimum period be specified for the " <i>consultation with another party</i> " and, if so, what period would be reasonable?	In Derbyshire County Council's experience of dealing with the discharge of Requirements for another DCO highways scheme, 14 days would be too onerous to respond to any consultation and so 28 days should be the minimum requirement.
1.48	Review and outstanding matters	Please could the local planning authorities and local highway authorities advise whether they: A have reviewed the detailed contents of Parts 1-9 of Schedule 3 and provided their comments to the Applicant; B are awaiting any responses from the Applicant and/ or is aware of any matters that have not been agreed with it;	a) to c) Derbyshire County Council has not provided any detailed comments to the applicant on Parts 1 – 9 of Schedule 3. This will require further ongoing discussion between the applicant and the County Council as Highway Authority.

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		C have any concerns about Parts 1-9 of Schedule 3?	
1.50	Review and outstanding matters	<p>Please could the local planning authorities and local highway authorities Applicant advise whether they:</p> <p>a) have reviewed the detailed contents of Parts 1-3 of Schedule 4 and provided their comments to the Applicant;</p> <p>b) are awaiting any responses from the Applicant and/ or is aware of any matters that have not been agreed with it;</p> <p>c) have any concerns about Parts 1-3 of Schedule 4?</p>	a) to c) Derbyshire County Council has not provided any detailed comments to the applicant on Parts 1 – 3 of Schedule 4. This will require further ongoing discussion with the County Council as Highway Authority.
1.55	Part 1 - Hedgerows Part 2 – Trees subject to tree preservation orders	Are the local planning authorities aware of any hedgerows or trees subject to a tree preservation order that are missing or incorrectly referenced in Schedule 8 and / or on the TPO and Hedgerows Plans?	This query should be directed to the relevant district/borough/unitary councils who should hold necessary details.
2.1	ES Chapters 1-4 [ <a href="#">REP1-014</a> ]	<p>ES paragraph 1.3.10 sets out the Applicant’s list of relevant adopted plans.</p> <p>A Does this constitute the full list of development plans and policies relevant to the Proposed Development? Please explain their relevance.</p> <p>B Are there are emerging development plans? If so, please supply copies there any emerging development plans? If so, at what stage are these proposed plans?,</p> <p>C If there are emerging development plans, are there any policies in them which may be relevant? If so, please supply copies.</p>	a) It is considered that in terms of Local Plans, reference should be made to the Derbyshire Local Transport Plan (LTP) 3 published in 2011 and the Saved Policies of the Adopted Derby and Derbyshire Minerals Local Plan (Adopted 2000 and Amended 2002) and the Saved Policies of the Derby and Derbyshire Waste Local Plan (Adopted 2005). Details of these policies are set out in Derbyshire County Council’s and

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		<p>D Are there any non-statutory local policies which may be relevant? If so, please supply copies.</p>	<p>High Peak Borough Council's Joint Local Impact Report.</p> <p>The Minerals Local Plan sets out policies for the supply of aggregates, particularly for the development industry and the need to safeguard important mineral resources in the County from non-mineral development.</p> <p>The Waste Local Plan sets out policies for the disposal, treatment and management of waste, particularly through landfill. <a href="#">Minerals and waste planning policy - Derbyshire County Council</a></p> <p>b) Derbyshire County Council is currently reviewing the LTP3 although the review is in its relatively early stages and there have yet to be any published consultations on the Plan.</p> <p>Derbyshire County Council and Derby City Council are currently reviewing both the Minerals and Waste Local Plans. An Issues and Options Consultation on the Minerals Local Plan was published for consultation in 2018 and it is</p>

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			<p>anticipated that a Draft Minerals Local Plan will be published for consultation in February 2022. No consultation has been carried out on the Waste Local Plan to date but it is anticipated that consultation on an Issues and Options Waste Local Plan will be published in the Spring of 2022.</p> <p>As such, at the current time, there are no published policies in either the Reviews of the Minerals or Waste Local Plans.</p> <p><a href="#">New Minerals Local Plan - Derbyshire County Council</a></p> <p><a href="#">Minerals local plan 2018 proposed approach - Derbyshire County Council</a></p> <p><a href="#">Waste Plan - Derbyshire County Council</a></p> <p>c) See answer to b) above.</p> <p>d) Not as far as Derbyshire County Council is concerned.</p>
2.2	The National Planning Policy Framework	The NPPF has been updated since the application was submitted.	a) The NPPF was revised in July 2021. The revisions increase the focus on design quality, not only for sites

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	(2021) (the NPPF)	<p>a) How do the revisions of the NPPF affect the Proposed Development and the ES?</p> <p>b) To what degree do you consider those development plan policies which you consider most relevant to the Proposed Development accord with the aims of the NPPF?</p> <p>c) Please could the Applicant comment on the implication of the following changes to the NPPF for the assessment of the Proposed Development:</p> <p>a) Chapter 9 Promoting Sustainable Development – design of streets and transport elements should reflect current national guidance, including the National Design Guide and National Model Design Code.</p> <p>b) Chapter 12 Achieving Well-designed Places – increased focus on making beautiful and sustainable places.</p>	<p>individually but for places as a whole. Many amendments were textual amendments rather than any substantial change in policy principles particularly relating to a firmer approach to protecting and enhancing the environment and promoting a sustainable pattern of development. Other changes related to the use of design codes and the important contribution of trees in new developments.</p> <p>In Chapter 8: Promoting Sustainable Transport, it is reiterated that walking and cycling networks should be attractive and well-designed. Paragraph 110 (previously 108) sets out what should be ensured when assessing sites that may be allocated for in development plans or specific applications for development, which has an additional point inserted as point C which reads that: <i>"the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code"</i>.</p>

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			<p>It is considered that these changes will need to be reflected in the applicant's Environment Statement and associated assessment of the scheme's compatibility with those changes, particularly more stringent requirements for good quality design.</p> <p>b) Development Plan policies of particular relevance to the assessment of the highways scheme are set out in Derbyshire County Council's and High Peak Borough Council's Local Impact Report. Development Plans of particular relevance referred in the LIR include the High Peak Local Plan which was adopted in 2016; the Derbyshire Local Transport Plan (LTP) 3 which was published in April 2011; the Saved Policies of the Derby and Derbyshire Minerals Local Plan (adopted in 2000 and revised in 2002); and the Saved Policies of the Derby and Derbyshire Waste Local Plan (adopted in 2005).</p> <p>From a Derbyshire County Council perspective, the LTP and Saved Policies of the Minerals and Waste Local Plans are all relatively dated and each of the Plans are currently being reviewed by Derbyshire County Council, particularly to reflect changes in national policy set</p>

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			<p>out in the revised NPPF of 2021. Nevertheless, although all dated, it is considered that the LTP and Minerals and Waste Plans include many of the broad policy principles of the Revised NPPF with regard to the promotion of sustainable development, promotion of sustainable transport and sustainable transport infrastructure and need to protect and enhance the natural and historic environments.</p>
2.3	Pollution control	<p>Paragraph 4.48 of the National Policy Statement for National Networks (NPSNN) refers to discharges or emissions which affect air quality, water quality, land quality or include noise and vibration. It notes that these may be subject to separate regulation under a pollution control framework or other consenting and licensing regime. Paragraph 4.55 refers to a need to ensure that the relevant pollution control authority is satisfied that potential releases can be adequately regulated and that the pollution effects would not be unacceptable.</p> <p>Are the relevant authorities satisfied that:</p> <ul style="list-style-type: none"> <li>a) the potential discharges and emissions from the Proposed Development would be adequately regulated under the appropriate regime; and that</li> <li>b) the effects of existing sources of pollution are not such that the cumulative effects of pollution when the Proposed Development is added would make</li> </ul>	<ul style="list-style-type: none"> <li>a) Yes</li> <li>b) Yes</li> </ul>



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		the development unacceptable, particularly in relation to statutory environmental quality limits?	
3.3	Case for the Scheme [ <a href="#">REP1-036</a> ] Section 2.1	<p>The Proposed Development is intended to provide benefits to the Strategic Route Network. The link road works are limited in extent and the length of new trunk road restricted to the dual carriageway section of the Proposed Development.</p> <ul style="list-style-type: none"> <li>• What contribution, if any, would the Proposed Development make to achieving the wider benefits identified in the Road Investment Strategy (RIS) for the strategic road network between Manchester, Sheffield and the M1?</li> <li>• Which other schemes, if any, identified in the RIS are needed to achieve the benefits identified for the scheme?</li> <li>• What delivery method has been identified for these schemes and how will they be secured?</li> </ul>	<p>The Transport Assessment Report (TAR) (APP-184) demonstrates that time saving benefits that will accrue from the Scheme and their spatial distribution.</p> <p>The TAR indicates that congestion through Mottram in Longdendale, Hattersley and Woolley Bridge will be relieved, improving journey times for trips on the Strategic Road Network (SRN) between Manchester and Sheffield</p>
3.5	Study areas and road sections Transport Assessment Report [ <a href="#">APP-185</a> ]	<p>The traffic data used within the modelling must be robust to properly assess the Proposed Development.</p> <p>Are the local authorities and local highway authorities content with the study area used in relation to transport networks and traffic?</p>	<p>Derbyshire County Council understands that the traffic model used in the appraisal of the scheme was developed from the Trans-Pennine South Regional Traffic Model (TPS RTM) augmented by locally observed traffic data. Figure 2.1 Provides an indication of the local study area. The County Council considers that the appropriate study area for simulation to the transport networks of traffic is broadly satisfactory.</p>

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3.6	<p>Baseline conditions, surveys and growth assumptions</p> <p>Transport Assessment Report [<a href="#">APP-185</a>] Section 1.1</p> <p>Peter Simon's Deadline 1 submission</p>	<p>The traffic data used within the modelling must be robust in order to properly assess the Proposed Development.</p> <p>a) Are the local authorities and local highway authorities satisfied that the input data used in the modelling is appropriate to provide a basis for predicting future traffic flows, with particular regard to the assessment of committed development and future traffic growth?</p> <p>b) Are the local authorities and local highway authorities satisfied that the effects of other works on the network have been suitably addressed within the model?</p> <p>c) Please comment on the potential for additional trips to be attracted to the route in the "Do-Something" scenario compared with the "Do-Minimum" scenario and the implications for the assessment.</p> <p>d) Do the local authorities and local highway authorities have any more comments regarding the Applicant's consideration of baseline conditions and surveys?</p>	<p>a. The A57 Transport Forecasting Package provides details of the forecast transport models developed in the appraisal of the scheme. It sets out the basis upon which future years traffic forecasts have been derived. Derbyshire County Council is broadly satisfied with the basis upon which they have been derived.</p> <p>b. No 'other works' are proposed on the County Council's highway network.</p> <p>c. The Transport Assessment Report alludes to traffic flows on both the A628 and A57 increasing slightly noting that traffic flows reduced elsewhere on the SRN although they affect too the extent to which this will happen in practise is perhaps limited by constraints on the existing highway particularly the A57 through Glossop</p> <p>d. No</p>
3.8	Local plans, other transport	a) Have impacts on local transport networks and policies set out in local plans, including local	a). There are a number of points on the local highway network that the County Council is unclear as to what the exact

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	<p>modes and other networks</p> <p>NPSNN paragraphs 5.203, 5.205-6, 5.211-2, 5.215-7</p>	<p>policies on demand management been addressed sufficiently?</p> <p>b) Has enough account has been taken of local models?</p> <p>c) Have reasonable opportunities been taken to support other transport modes?</p> <p>d) Is the detail in the local transport model for the assessment of impacts proportionate to the scale and consideration of the impact of uncertainty on project impacts?</p> <p>e) Has there been a proportionate assessment of the transport impacts on other networks?</p>	<p>impacts of the scheme are likely to be. These are the subject of ongoing discussions between the County Council and NH.</p> <p>b). Derbyshire County Council do not have any traffic models covering Glossop.</p> <p>c). The Glossop A57 Link Roads project is identified in Derbyshire's LTP3. It refers to the Longdendale Integrated Transport Strategy LITS has a number of relevant transport objectives to address the key problems and issues within the Longdendale villages including a reduction in journey times on the local bus network and improve the services provided by buses.</p> <p>This would allow for, possibly increased frequency of bus services on selected routes, running throughout the day, seven days a week, between Glossop, Hyde, Ashton-under-Lyne and beyond together with increased opportunities for pedestrians to cross roads safely and feel less intimidated by traffic when using footways and better</p>

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			<p>opportunities to encourage cyclists to use the local highway network.</p> <p>d). The County Council believe so.</p> <p>e). Yes</p>
3.9	Overall assessment methodology	Do the local authorities and local highway authorities have any more comments regarding the Applicant's overall assessment methodology, growth assumptions or modelling techniques?	<p>Derbyshire County Council believe the Applicants traffic modelling and economics assessments, along with the environmental assessments were carried out by a suitably competent consulting engineer in line with TAG guidance, these are then subject for scrutiny from Safety Engineering Standards (SES) and Transport Planning Group (TPG), who are independent of the project team and ensure that the process is followed throughout, and that the reports are fit for purpose.</p> <p>We understand also that the assessment work has been through a scrutiny process undertaken by an independent technical assurance team, in this case all of the work has been independently assured by WSP and final sign off by SES and TPG as being compliant with the guidance.</p>

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3.15	Case for the Scheme [ <a href="#">REP1-036</a> ] Para 4.6.15	<p>The intention is stated to restrict use of the main carriageway of the scheme by walkers, cyclists, and horse riders.</p> <p>A Would the Applicant please confirm the stretches of carriageway over which cycling will be prohibited and provide justification for the proposed restrictions.</p> <p>B Would the Applicant explain how these restrictions will be delivered?</p> <p>C If cycling provision is to be made outside the main carriageway, would the Applicant please explain what assessment has been made of likely levels of usage and potential for modal conflict.</p> <p>D Please explain what design parameters, including, but not restricted to, width of route and design speed, have been used for off-carriageway routes and reasons for selecting those parameters.</p> <p>E Do the local authorities and local highway authorities have any comments on the adequacy of this level of provision to cater for cycling demand on the local network and the support it provides for alternative modes of transport to the private car?</p>	<p>e)Derbyshire County Council's key concerns relate to the connectivity of the highway scheme with the surrounding Public Rights of Way network, particularly the Trans-Pennine Trail that runs close to the eastern boundary of the scheme adjacent to the River Etherow and existing A57 Wooley Bridge. Derbyshire County Council welcomes and supports the proposed design of the link road, which includes provision of a new footpath/cycle path running alongside the south-side of the new highway link road to Mottram Moor. Clarification is required, however, whether the footpath / cyclepath would also be used for horse riders.</p> <p>Derbyshire County Council also welcomes the connection of the new footpath / cyclepath with the Trans-Pennine Trail where it emerges alongside the River Etherow adjacent to the existing A57. This was an issue raised with National Highways on its PEIR consultation in 2020 and has now been addressed by the applicant in its DCO submission.</p>
3.18	Flood Risk Assessment [ <a href="#">REP1-013</a> ] <a href="#">Insert 4-7 and Engineering</a>	<p>These documents provide conflicting information in regard to minimum overhead clearances.</p> <p>a) Would the Applicant please clarify which information is correct?</p>	<p>The Lead Local Flood Authority is not in a position to comment on minimum overhead clearances.</p>

No.	Reference	Question	Derbyshire County Council Response
	Drawings and Sections Plans [APP-012]	b) Is the proposed overhead clearance to the Public Right of Way appropriate?	
3.19	<a href="#">Various Relevant Representations</a>	<p>Traffic flows crossing the Peak District on the A628 Woodhead Road and A57 Snake Road are anticipated to increase if the development proposal is implemented. Several Public Rights of Way cross these motor traffic routes.</p> <p>a) Has any statistical or other analysis of the comparison between the "Do-Minimum" and "Do Something" options of the distribution of acceptable gaps for pedestrians to cross the road been made?</p> <p>b) Do the local authorities and local highway authorities have any comments?</p>	<p>(a) No analysis has been done by Derbyshire County Council on options for mitigations for the rights of way where increases in traffic would increase the difficulty in crossings here. Expectations are that this is done as a mitigation measure and options be presented to Derbyshire County Council for their thoughts.</p> <p>(b) The safety of the A57 Snake Pass is a major concern to the County Council as it is traditionally a route where various safety measures have been undertaken over the years. Any increases in flows along this route will compromise road safety further. As the County Council has exhausted its road safety engineering options for the route the only solution to ensure safety along the route is considered to be a system of average speed cameras in order to ensure vehicle speeds and road safety is maintained to the required level. DCC considers that</p>

No.	Reference	Question	Derbyshire County Council Response
			National Highways should fund the scheme.
3.21	Case for the Scheme [ <a href="#">REP1-036</a> ] Para 1.3.4 Speed Limits and Traffic Regulations Plans [ <a href="#">REP1-004</a> ] Sheet 2 of 2	<p>The Applicant proposes that safety measures and improvements, including a reduced speed limit, new cycling facilities and improved pedestrian crossings will be introduced on Wooley Lane to improve connectivity. The route would remain open to through traffic.</p> <p>a) Please clarify any identified aims, if any, of such works?</p> <p>b) What discussion has there been regarding the feasibility of delivery of works, including any Traffic Regulation Orders (TROs) to achieve the above aims?</p> <p>c) How would the proposed speed limit be enforced?</p> <p>d) Would enforcement be effective?</p> <p>e) Would there be remain any perceived benefit to using this route for motorised vehicle journeys between the Mottram Back Moor Junction and the junction of Wooley Lane with Wooley Bridge and Hadfield Road, rather than the route provided by the proposed link road.</p>	<p>(a) Any measures along Wooley Lane need to ensure that traffic heading towards Manchester does not turn left from the A628 onto it before it gets new link road. Wooley Lane is not suitable for increases in traffic flow and the road safety at the existing mini roundabout in Derbyshire would be compromised. The congestion leading into Glossop on this approach is already a concern. The introduction of cycle facilities, a reduced speed limit, pedestrian crossings will do nothing to deter traffic from using it. A prohibition of the use of Wooley Lane from the A628 would be more desirable in order to transfer the traffic entering Glossop to use the new link road.</p> <p>(b) There have been no discussions with DCC regarding the delivery of works here.</p> <p>(c) No plans have been seen by DCC on any proposals to date</p> <p>(d) No plans have been seen by DCC on any proposals to date.</p> <p>(e) Perhaps one way towards the A628 would benefit local drivers together</p>

No.	Reference	Question	Derbyshire County Council Response
			with associated traffic calming measures, but would prevent it being used in preference to the new link road for those travelling towards Glossop from the A628
3.22	Case for the Scheme [ <a href="#">REP1-036</a> ]	<p>One of the stated aims of the scheme relates to reconnecting communities along the Trans-Pennine Route. The Case for the scheme refers to increased pedestrian and cycle provision at the Gunn Inn Junction (Market Street/Wooley Lane/Mottram Moor) and traffic management measures on Market Street and Mottram Moor to increase pedestrian safety and connectivity.</p> <p>a) Are any details of these proposals available?</p> <p>b) Have these been subject to safety audit, if so, at what stage?</p> <p>c) Do the local authorities and local highway authorities have any comments on the deliverability and effect of such proposals?</p>	(a) The A628 through Hollingworth and Tintwistle is the responsibility of National Highways rather than Derbyshire County Council. The residents of Tintwistle in Derbyshire would however welcome mitigation in terms of a form of traffic calming through the village along the A628. There are however also major concerns that vehicles could potentially turn off the existing A628 at its junction with New Road at Tintwistle and travel towards the villages of Hadfield and Padfield and then into Glossop as opposed to using the trunk road network. These Derbyshire roads need protecting from such usage which would be detrimental to their existing road safety records. Derbyshire County Council would welcome discussions over how this is mitigated against. The suggested scheme on Woolley Lane also should prohibit vehicles travelling south east towards



No.	Reference	Question	Derbyshire County Council Response
			<p>Glossop as opposed to using the new link road to travel towards Glossop. Derbyshire County Council do not feel the measures suggested in this document will reduce vehicle flows but hopefully merely manage their speed.</p> <p>(b) Not a Derbyshire County Council scheme.</p> <p>(c) As (a) and Derbyshire County Council also have concerns about the A624 as migration measures on the A57 Snake Pass will also lead to vehicles transferring onto the A624 which also has a poor collision history. This needs to be considered too.</p>
3.23	<p>Case for the Scheme [<a href="#">REP1-036</a>] Section 3.5</p> <p>Outline EMP [<a href="#">APP-183</a>] Table 6.1</p>	<p>Appropriate arrangements will need to be in place to make provision for the future maintenance of the works. It is proposed that Carrhouse Lane Underpass and River Etherow Bridge are to be maintained in their entirety by Tameside Metropolitan Borough Council, and that the surface of Roe Cross Road overbridge and the surface and surrounding landscaping of Mottram Underpass will be maintained by Tameside Metropolitan Borough Council. Other maintenance responsibilities are identified in the Outline EMP at Table 6.1</p> <p>a) How would the future maintenance arrangements be secured?</p>	<p>(a) Derbyshire County Council would welcome opportunity to work with the design for a period after completion to ensure all defects are rectified and the standards are consistent with the County Council's asset management documents and agreed specifications.</p> <p>(b) Early involvement with adoption of street furniture / traffic signals equipment and highway and drainage infrastructure is essential. All assets must be to the</p>

No.	Reference	Question	Derbyshire County Council Response
		b) Would the local authorities and local highway authorities please confirm that these arrangements are acceptable or, if not, what is needed to make them acceptable?	standards required by the County Council. Derbyshire County Council Asset Management documents and specifications have already been forwarded to National Highways and their design teams.
3.24		<p>Congestion on roads to either side of the development proposal may engender driver frustration, and this may encourage drivers to try to overtake if presented with free-flow.</p> <p>a) Would the two Link Roads provide safe overtaking opportunities?</p> <p>b) If not, what measures would be appropriate to prevent unsafe overtaking?</p> <p>c) How would these be delivered?</p>	Most of the link road is under the control of Tameside MBC. There is only a small section relevant to Derbyshire so decisions taken by Tameside MBC will influence design decisions. It is hoped that Tameside MBC and National Highways will communicate their thoughts to DCC.
3.25	<p>Case for the Scheme [<a href="#">REP1-036</a>] Section 4.5</p> <p>Transport Assessment Report [<a href="#">APP-185</a>] Paragraphs 7.2.22 – 7.2.14.</p>	<p>The Proposed Development identifies an increase in accidents and casualties over the appraisal period. Reference is made to the pursuit of measures to minimise these impacts, with particular reference to Snake Pass.</p> <p>a) Have any measures to address this increase been identified, either on Snake Pass or elsewhere?</p> <p>b) Have any discussions taken place with the local authorities and/or local highway authorities with regard to the implementation of such schemes?</p> <p>c) Do the local authorities and local highway authorities have any comment on the likely success of any such schemes in delivering</p>	<p>(a) The County Council have exhausted traditional road safety engineering options on the A57 Snake Pass. If future traffic is added, then average speed cameras throughout its length must be considered to ensure safety here. The A624 where traffic may be transferred also needs to be considered in a similar way.</p> <p>(b) Not at this point in time</p> <p>(c) There is significant national evidence to suggest average speed cameras are effective in these rural</p>

No.	Reference	Question	Derbyshire County Council Response
		<p>accident savings on a scale equivalent to the identified disbenefit resultant from the scheme?</p> <p>d) What delivery methods, if any, have been identified to secure any proposals?</p>	<p>route situations and give good rates of return.</p> <p>(d) None to date in Derbyshire</p>
3.26	Scheme Layout Plans [ <a href="#">APP-011</a> ] Sheet 6 of 10	<p>The Wooley Bridge junction at the eastern end of the scheme has been designed as a signal-controlled crossroads. The main traffic flows appear to be on the western and southern arms of the junction, with lower flows on the eastern and northern arms.</p> <p>a) Would the Applicant please provide a proposed turning flow summary and staging diagram for the proposed junction.</p> <p>b) Would the Applicant please explain what alternatives were considered for this junction and why was the solution proposed considered the correct one?</p> <p>c) Have the local authorities and local highway authorities any comments to make on the proposed layout of the junction?</p>	<p>(a) For National Highways  (b) For National Highways  (c) Detailed comments have already been provided to National Highways Design teams on the Traffic Signal Junction Layout. Therefore, the Highway Authority have already commented on the proposed scheme for the Traffic Signals and Street Lighting. In summary these comments indicate that:</p> <p>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.</p>

No.	Reference	Question	Derbyshire County Council Response
			<p>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 National Highways 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 National Highways position that a two-lane design solution is required for capacity reasons.</p> <p>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.</p>

No.	Reference	Question	Derbyshire County Council Response
3.28	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	a) Please could the Applicant summarise how travel patterns have been modelled during construction? b) What feedback from local authorities and local highway authorities has been incorporated? c) Please could the local authorities and local highway authorities comment?	(a) For National Highways (b) For National Highways (c) Derbyshire County Council notes the contents of OTMP, in particular section 2.8.1. This gives due consideration to construction of the Woolley Bridge Junction. Attention is drawn to the County Council's response to 3.29(c). see below.
3.29	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	It is stated that operations of limited durations might take place outside of the core working hours, as defined in the dDCO due to safety requirements. <ul style="list-style-type: none"> <li>• Please could the Applicant:               <ol style="list-style-type: none"> <li>a) justify the need for such working;</li> <li>b) summarise the predicted impacts; and</li> <li>c) clarify the mechanism for agreement of such exceptional working how this is secured through the dDCO?</li> </ol> </li> <li>• Please could the local authorities and local highway authorities comment?</li> </ul>	(a) National Highways to comment (b) National Highways to comment. (c) Early engagement is required with street works and traffic management staff at Derbyshire County Council to discuss local stakeholder and district council (public health authority – Section 61) and public engagement. For out of hours works earliest engagement possible is essential to avoid public criticism.
3.30	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	It is stated that the A57 Trunk Road may, during the works, be used as a diversion route during other operations. <ol style="list-style-type: none"> <li>a) What consultation would take place with local authorities, local highway authorities and other Interested Parties regarding such proposals?</li> <li>b) Please could the local authorities and local highway authorities comment?</li> </ol>	(a) For National Highways (b) As explained previously early engagement before the 28 days period would be welcomed to ensure coordination with any other parties involved with street works on the Derbyshire network. There are already pressures upon the A57 at peak times.

No.	Reference	Question	Derbyshire County Council Response
3.31	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	a) How will the needs of vulnerable users traversing the works be assessed? b) Please could the local authorities and local highway authorities comment	(a) For National Highways (b) This does need to be carefully considered as there are local hospitals and disabled and other vulnerable users which need to be considered. Derbyshire County Council would like to work closely with National Highways representatives to ensure that this is the case.
3.32	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	a) Is any review process proposed to assess the effectiveness and safety of traffic management measures during the construction phase? b) If so, what arrangements will be put in place to amend traffic management? c) Please could the local authorities and local highway authorities comment?	(a) National Highways to consider (b) National Highways to consider (c) As mentioned previously, early engagement and coordination is essential
3.34	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	a) Has any assessment been made of the impact of the proposed Outline Traffic Management Plan on bus services? b) Please could the local authorities and local highway authorities comment?	(a) National Highways to consider (b) Early sight of any traffic management plan is essential and having an input into its content.
3.35	Outline Traffic Management Plan [ <a href="#">REP1-038</a> ]	Have the local authorities or local highway authorities any comments on: a) the practicability of the Outline Traffic Management Plan; b) measures that should be included in the Detailed Traffic Management Plan;	(a) Derbyshire County Council are mindful this is the strategic route out of Derbyshire into Manchester and all works will have a significant impact on through and local traffic in the Glossop area. (b) As (a)

No.	Reference	Question	Derbyshire County Council Response
		c) the timing of the issue of the Detailed Traffic Management Plan; or d) the need for the Detailed Traffic Management Plan to be consulted on and/ or agreed with them?	(c) As (a) (d) As (a)
3.36	dDCO [ <a href="#">REP1-041</a> ] Outline Traffic Management Plan [ <a href="#">REP1-038</a> ] Outline EMP [ <a href="#">APP-183</a> ]	Do the local authorities have any more comments regarding the Applicant's assessment of construction traffic and temporary closures and diversions, including: a) the nature of likely effects on receptors; b) relevant mitigation measures secured by the dDCO, Outline Traffic Management Plan, and Outline EMP; c) whether any potential to worsen accessibility would be mitigated so far as reasonably possible; d) the sufficiency of consideration given to mitigation by way of the design, lay-out or construction methods for the Proposed Development; e) whether the mitigation measures are proportionate, reasonable and focussed on promoting sustainable development; f) whether the mitigation measures are enforceable, precise, sufficiently secured and likely to result in the identified residual impacts; g) the identification of all significant impacts; and h) road safety during construction?	As 3.35 for all (a) to (h). Derbyshire County Council would generally welcome advice from the National Highways Design team at an early stage on what mitigations can be provided due to the lack to diversionary routes on the Derbyshire Network. There are safety concerns due to the lack of options on the Derbyshire Network.
3.37	Public transport Bus stops	a) Where a bus stop is to be removed, relocated or replaced would the applicant please provide a Figure showing:	General Comment- It is very difficult to say with any certainty what would happen with bus services when the new

No.	Reference	Question	Derbyshire County Council Response
		<ul style="list-style-type: none"> <li>• the location of the bus stop to be removed, relocated, or replaced;</li> <li>• where a bus stop will be relocated or replaced, the proposed location of the bus stop and the distance between that and the position of the existing stop; and</li> <li>• where a bus stop is to be removed, the location of the nearest alternative bus stop and the distance between that and the position of the stop to be removed.</li> </ul> <p>b) What local requirements for public consultation or approvals (if any) exist to remove, relocate or replace a bus stop?</p> <p>Do the local authorities or local highway authorities have any comments on proposed changes to bus stop locations?</p>	<p>road opens and the impact this would have on demand for new bus stops. The bus operators may choose to stay on the old road and continue their current routes as this is where the existing demand is likely to be or they may change to the new road in the hope this generates new fresh demand. At the moment because of the state of the bus market it is hard to say which services will be in place in 6 months time so second guessing the state of the market in the years it will take to complete this new road would be virtually impossible. There is the further complication of bus franchising which Transport for Greater Manchester will be introducing in the next 5-10 years which will mean certain routes such as the existing 237 are likely to be specified by TFGM who will have the final say on the route.</p> <p>a) There are two (Derbyshire County Council) bus stops which fall within the DCO boundary. Both are on Woolley Bridge, one with a shelter, north-west bound just before the Woolley Bridge Road junction and the other southbound in the vicinity of the new A57 Link Road junction with</p>



No.	Reference	Question	Derbyshire County Council Response
			<p>Woolley Bridge. As indicated on 'Sheet 6' there is a development access immediately within this junction and in conjunction with this the bus stop has recently been relocated to a new position approximately 18m south (but is still within the DCO). This latter stop is likely to require further relocation in conjunction with the construction of the A57 Link Road junction. Neither of the two bus stops are indicated on the scheme layout plans – Sheet 6 being the relevant one here. It should be noted that (from 10/01/2022) neither of these stops are in use as part of the local bus network. It is not thought likely that any of the services currently forming the local bus network would use the Link Road but any new service broadly linking Glossop with Manchester may well do so. If, at some future point, local bus services were to use the new Link Road it is likely that new bus stop positions would be beneficial on the Link Road itself and as such passive provision should be considered for these. Depending on the actual position these may fall within the</p>

No.	Reference	Question	Derbyshire County Council Response
			<p>jurisdiction of Transport for Greater Manchester.</p> <p>b) There are no local requirements for public consultation or approvals to remove, relocate or replace a bus stop. This only varies where a bus shelter is involved and, on such occasion, there is a requirement to notify (not consult) intentions to any properties in the immediate vicinity. That said, Derbyshire County Council would expect that any requirement to relocate a bus stop facility because of the Link Road provision be clearly shown as such on any public facing plans at the earliest opportunity. Any new bus stop position would be required to meet requirements of the Derbyshire County Council Highway Traffic &amp; Safety team and be constructed such that it meets the relevant accessibility standards. In this instance National Highways would be expected to cover all costs associated with any change to a bus stop location within the DCO which is required because of the Link Road provision.</p>

No.	Reference	Question	Derbyshire County Council Response
5.4	Viewpoints Night-time assessment ES Chapter 7 <a href="#">[APP-063]</a>	Paragraph 7.3.66 sets out viewpoints used to aid the assessment of night-time effects arising from operational lighting.  Are the local authorities and Peak District National Park Authority content that the chosen viewpoints are representative?	From a Derbyshire County Council perspective these viewpoints have been considered and appear appropriate.
5.6	Significant effect duration ES Chapter 7 <a href="#">[APP-063]</a> ES Chapter 16 <a href="#">[APP-072]</a>	Table 7.20 of ES Chapter 7 sets out criteria for different durations of change. Durations are not set out in the ES Chapter 7 summary in Section 7.12. The term " <i>Temporary</i> " is used for some significant effects in ES Chapter 16, but no durations are identified for other significant effects.  Please could the duration of all significant effects be clarified in Section 7.12 of Chapter 7 and in ES Chapter 16?	This is standard practice and is supported
5.7	Outstanding study area, baseline conditions and overall assessment methodology concerns	a) Are the local authorities, Peak District National Park Authority and Natural England satisfied with the approach for landscape and visual with respect to: <ul style="list-style-type: none"> <li>• the study area and visibility;</li> <li>• the receptors selected for the assessment and whether they are representative;</li> <li>• the definitions of value, significance, sensitivity and magnitude of impact; and</li> <li>• the criteria used to define significant effect?</li> </ul> How should any outstanding concerns be addressed?	From a Derbyshire County Council perspective the study area and viewpoints have been considered and all seem appropriate for the identification of significant landscape and visual effects. The LVIA methodology broadly accords with the guidance in GLVIA3 – Derbyshire County Council’s preference would be for all effects to be considered (and mitigated) and not just those deemed to be significant.

No.	Reference	Question	Derbyshire County Council Response
5.9	National Character Area 54 ES Chapter 7 <a href="#">[APP-063]</a>	<p>Table 7.21 refers to National Character Area 54 having local importance and medium value, leading to it having medium value. Medium sensitivity is used in Table 7.26, whereas Table 7.27 considers it to have high sensitivity.</p> <p>Please clarify the sensitivity used in the assessment, explain how it is in accordance with the methodology set out in paragraphs 7.3.49 to 7.3.53. and update ES Chapter 7 as appropriate.</p>	This appears to be a question directed to the applicant
5.15	<p>Outstanding landscape impact assessment concerns</p> <p>ES Chapter 7 <a href="#">[APP-063]</a></p> <p>ES Chapter 16 <a href="#">[APP-072]</a></p> <p>REAC <a href="#">[REP1-037]</a></p> <p>Figure 2.4 Environmental Masterplan <a href="#">[APP-074]</a></p>	<p>a) Do the local authorities, Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> <li>• the landscape and townscape impact assessment;</li> <li>• mitigation measures including the REAC and Environmental Masterplan;</li> <li>• whether a draft Landscape and Ecological Management Plan should be submitted to the Examination;</li> <li>• the maintenance regime, monitoring and remedial actions during operation; or</li> <li>• compliance with policy?</li> </ul> <p>b) Are there any reasons to question that there would be no significant effects on landscape or townscape character, other than the temporary effects identified in ES Chapter 16?</p> <p>How should any outstanding concerns be addressed?</p>	Derbyshire County Council would support the submission of a draft LEMP being submitted to the Examination to ensure that the necessary management measures are in place to deliver the proposed mitigation and identified environmental benefits, which are all part of the planning balance.

No.	Reference	Question	Derbyshire County Council Response
5.19	<p>Outstanding visual impact assessment concerns</p> <p>ES Chapter 7 [APP-063]</p> <p>ES Chapter 16 [APP-072]</p> <p>REAC [REP1-037]</p> <p>Figure 2.4 Environmental Masterplan [APP-074]</p>	<p>a) Do the local authorities or Peak District National Park Authority and Natural England have any outstanding concerns regarding:</p> <ul style="list-style-type: none"> <li>• the visual impact assessment;</li> <li>• mitigation measures including the REAC and Environmental Masterplan;</li> <li>• whether a draft Landscape and Ecological Management Plan should be submitted to the Examination;</li> <li>• the maintenance regime, monitoring and remedial actions during operation; or</li> <li>• compliance with policy?</li> </ul> <p>b) Are there any reasons to question that there would be any significant visual effects other than those summarised in ES Chapter 16?</p> <p>How should any outstanding concerns be addressed?</p>	<p>Derbyshire County Council would support the submission of a draft LEMP being submitted to the Examination to ensure that the necessary management measures are in place to deliver the proposed mitigation and identified environmental benefits, which are all part of the planning balance</p>
5.21	<p>ES Chapter 7 [APP-063]</p> <p>NPSNN Paragraphs 4.28-4.35</p> <p>NPPF</p>	<p>a) Are the measures set out in Section 7.8 of ES Chapter 7 sufficient to mitigate any adverse effects from the Proposed Development and enable the projects to satisfy the requirements of the NPSNN, the NPPF and local policies for visual amenity and landscape?</p> <p>Should any further measures be required?</p>	<p>No objection has been maintained by Derbyshire County Council on this matter.</p>
5.22	<p>Finishes, street furniture and hard landscaping</p>	<p>As above, the delivery of good design is an aspiration of the NPSNN and government.</p>	<p>Derbyshire County Council would support the submission of early details relating to design because these</p>

No.	Reference	Question	Derbyshire County Council Response
		<p>a) At what stage will details of finishes to the scheme, street furniture and other hard landscaping be provided?</p> <p>b) Should the proposed finishes and street furniture, etc. be agreed with the local authorities and local highway authorities? How would such agreement be reached?</p>	<p>considerations are part of the planning balance.</p>
5.23	<p>NPSNN Design Principles for National Infrastructure National Design Guide</p>	<p>In the context of NPSNN Paragraphs 4.28-4.35 and 5.160 please explain how the design of Proposed Development meets the Design Principles for National Infrastructure in respect of Climate, Places, People and Value and the National Design Guide in respect of Climate, Character and Community in during construction and operation.</p> <p>a) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the Proposed Development into the landscape is achieved in the detailed design, construction and operation of the Proposed Development.</p> <p>b) How might they be secured?</p> <p>c) Are any further measures appropriate?</p> <ul style="list-style-type: none"> <li>• A “<i>design champion</i>” to advise on the quality of sustainable design and the spatial integration of the works;</li> <li>• A “<i>design review panel</i>” to provide informed “<i>critical-friend</i>” comment on the developing sustainable design proposals;</li> </ul>	<p>Yes. In the opinion of Derbyshire County Council, the implementation of any or all of the measures would assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design.</p>

No.	Reference	Question	Derbyshire County Council Response
		<ul style="list-style-type: none"> <li>• An approved “<i>design code</i>” or “<i>design approach document</i>” to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design;</li> <li>• An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees.</li> </ul> <p>In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?</p>	
6.1	ES Chapter 6 <a href="#">[REP1-015]</a>	Table 6.2 sets out the criteria to determine the value of heritage assets. Do you have any comments regarding the values placed on the designated heritage assets in this table?	Derbyshire County Council has no comments to add in relation to the values ascribed to the various heritage assets in Table 6-2.
6.4	ES Chapter 6 <a href="#">[REP1-015]</a>	<p>When referring to designated heritage assets, the NPPF only identifies two levels of harm, substantial and less than substantial. Table 6.3, which sets out the factors in assessing the magnitude of impact, also identifies limited harm.</p> <p>A) Applicant - Please set out whether limited harm should be qualified as less than substantial in terms of the NPPF tests? If not, please explain how limited harm should be considered against paragraph 199 of the NPPF which states that great weight should be given to an asset’s conservation irrespective of whether any potential harm amounts to substantial,</p>	<p>A) It is the opinion of Derbyshire County Council that limited harm is still harm and as such it should be considered as falling under less than substantial harm (LTSH) under the current NPPF.</p> <p>B) It is the opinion of Derbyshire County Council that there are varying degrees of harm within either categories; substantial harm (SH) or LTSH although granted this may not be alluded to in the current NPPF. With this in mind it is the County Council’s opinion that the</p>

No.	Reference	Question	Derbyshire County Council Response
		<p>total loss or less than substantial harm to its significance.</p> <p>B) Historic England, Derbyshire County Council, High Peak Borough Council and Tameside Metropolitan Borough Council – Do you have any comments on the use of limited harm given the tests sets out in the NPPF?</p>	<p>term 'limited harm' could be interpreted as being at the lower end of the scale of LTSH.</p>
6.8	Mottram Old Hall	<p>The excavation of the Mottram Underpass cutting would result in the partial truncation of the former grounds of Mottram Old Hall. Do you consider that the parkland contributes to the significance of this designated heritage asset?</p>	<p>For consideration by Tameside Metropolitan Borough Council.</p>
8.1	Legislation, policy and carbon reduction targets	<p>Section 14.2 of ES Chapter 14 [<a href="#">REP1-019</a>] sets out relevant international, national, and local policies, the UK's carbon reduction targets and carbon budgets, and the Applicant's commentary on the requirements and implications for the Proposed Development.</p> <p>A) Are there any other key matters that should be added to the Applicant's commentaries on the legislation and policies?</p> <p>B) Is there any other important or relevant legislation or policy that the ExA should consider?</p> <p>C) Are there any other carbon reduction targets or carbon budgets that are relevant to the Proposed Development and for which there is a clear legal or policy basis for them to be considered?</p> <p>D) Should any UK case law/ court judgements be identified?</p>	<p>A) Nothing to note</p> <p>B) International: The UK's Nationally Determined Contribution (NDC) to the UNFCCC.</p> <p>Local: Derbyshire County Council's Climate Change Strategy: Achieving Net Zero (2021-2025) - <a href="#">Climate change strategy</a> [REDACTED]</p> <p>C) Nothing to note</p> <p>D) Nothing to note</p> <p>E) Unknown</p>



No.	Reference	Question	Derbyshire County Council Response
		<p>E) Do National Highways have any carbon reduction targets that have not been published and/ or that it intends to apply on the Proposed Development?</p> <p>When responding please, where possible, explain why your comments relevant to the Proposed Development and to the ExA's consideration of it.</p>	
8.11	Mitigation measures PAS 2080: 2016	<p>Item C1.8 of the REAC <a href="#">[REP1-037]</a> states that:  <i>"A comprehensive Carbon Management Plan would be implemented from the Detailed Design stage and through construction. This would follow a data collection and analysis methodology which adheres to the requirements of the PAS 2080. This would assess carbon use for the whole lifecycle of the project and promote embodied carbon management and commit to achieving carbon reductions."</i></p> <p>The ExA wishes to ensure that the mitigation measures are enforceable and precise and will result in mitigation being delivered.</p> <p>a) Please could more detail be provided on the Carbon Management Plan and how it would be enforced?</p> <p>b) How can the precision be improved to clarify that carbon emissions would be reduced?</p> <p>c) To be precise, should the reduction be quantified?</p> <p>d) How will the mitigation ensure that the carbon footprint is not unnecessarily high?</p> <p>e) Who should be consulted with, how should it be approved, and what monitoring measures are appropriate?</p>	<p>General comments/expectations relating to a Carbon Management Plan from Derbyshire County Council's perspective:</p> <ul style="list-style-type: none"> <li>• It should clearly set out ownership of targets and actions.</li> <li>• As well as emissions from construction and operation, the Plan should consider indirect emissions, such as from business overheads which can be attributable to the Scheme and business miles associated with the Scheme's construction and operation (including employee commuting miles).</li> <li>• The Plan should set out how the Contractor's approach to delivery will support the relevant net zero targets.</li> <li>• The Plan should establish a baseline carbon footprint against which future targets will be based.</li> <li>• The Plan should detail the framework and methodology for calculating the</li> </ul>

No.	Reference	Question	Derbyshire County Council Response
		Please could the local authorities and the Environment Agency comment?	<p>baseline and future assessments, providing references and justifications for the methodologies adopted.</p> <ul style="list-style-type: none"> <li>• The Plan should identify carbon reduction targets for the first contract year, detailing how these targets are to be met (as a minimum for all listed activities).</li> </ul>
8.14	Mitigation	<p>Paragraph 14.13.1 of ES Chapter 14 <a href="#">[REP1-019]</a> states that "...mitigation measures have been embedded into the Scheme design (Section 14.9) to reduce emissions as far as possible."</p> <p>Have appropriate carbon-reduction measures been secured for the Operation phase, including but not limited to:</p> <ul style="list-style-type: none"> <li>a) reducing traffic;</li> <li>b) increasing the use of other transport modes;</li> <li>c) behavioural change;</li> <li>d) the use of energy, including for lighting;</li> <li>e) the use of trees or other plants in the soft landscaping to absorb carbon dioxide;</li> <li>f) carbon offsetting;</li> <li>g) any other measures.</li> </ul>	<ul style="list-style-type: none"> <li>a) See Derbyshire County Council's comments in respect of questions in Section 3 above.</li> <li>b) There appears to be a lack of reference to, and acknowledgement of, the government's strategic priorities of increasing modal shift to active travel. Segregated cycling routes are proposed as part of the Scheme, but it doesn't seem to contribute enough to creating a network of cycleways and footways that would encourage active travel and reduce the reliance on vehicle use.</li> <li>c) Nothing to note</li> <li>d) The assessment does not seem to take account of any potential opportunities for renewable energy installations and generation within</li> </ul>

No.	Reference	Question	Derbyshire County Council Response
			<p>the Scheme's boundary, which seems like a missed opportunity to explore options.</p> <p>e) The assessment does not seem to make reference to measures around habitat creation and protection, which would have benefits from a carbon offsetting/sequestration, and also climate change adaptation point of view.</p> <p>f) Same as above (for e)</p> <p>g) Nothing to note</p>
8.16	Outstanding concerns	Do the local authorities or the Environment Agency have any outstanding concerns regarding the assessment methodology, potential impacts, mitigation measures, monitoring, or compliance with policy with respect to climate change?	<ul style="list-style-type: none"> <li>• It is disappointing that emissions from short- and long-term land use change have not been included in the assessment, with the justification being that 'a proportionate approach shall be applied to calculating and reporting GHG emissions from changes in land use and forestry (i.e. reporting only where there is likely to be a substantial change)'. The carbon (and wider sustainability) impact of land use change can be significant over the life-time of a Scheme, such as through soil disturbance, and loss of vegetation and biomass.</li> </ul>

No.	Reference	Question	Derbyshire County Council Response
			<ul style="list-style-type: none"> <li>• 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.</li> <li>• It is disappointing that the air quality assessment does not include an analysis of the impact of climate change on air quality. Vehicle emissions will be intensified as hotter summers will increase the formation of ground-level ozone, which is a dangerous air pollutant. The statement given that these types of impacts will likely be offset by the predicted future fleet wide shift toward electric and hybrid vehicles does not have any sound evidence to back it up.</li> </ul>
10.4	ES Chapter 10 <a href="#">[APP-066]</a> Table 10.4 and	Table 10.4 identifies a target for use of recycled aggregates of 30%. a) Have potential sources of recycled aggregates been identified?	Availability of recycled aggregates in Derbyshire:  The total throughput of recycled aggregates for 2020 in Derbyshire,

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	Paragraph 10.9.1	<p>b) If not, what degree of certainty is there that this proportion of aggregate supply for the scheme can be secured?</p> <p>Would the local authorities comment on availability of suitable recycled aggregates?</p>	<p>minus asbestos and gypsum-based materials, was 314,000t. Of this, 26,500t was deposited to land as recovery and 33,000t was biological treatment at the former Coalite site in Bolsover in Derbyshire– it is unlikely that these would be available for use in the road scheme, leaving a total of 254,500t. These figures do not include any inert waste used for quarry restoration. It should be noted that the emerging Derby and Derbyshire Minerals Plan will refer to around 3mt of recycled/secondary aggregate being produced annually within the Local Plan area.</p> <p>More detailed comments on the waste implications of the proposed scheme are set out in the Derbyshire County Council and High Peak Borough Council Local Impact Report.</p>
10.5	<p>Waste management ES Chapter 10 [APP-066]</p> <p>NPSNN paragraph 5.43</p>	<p>Please comment on:</p> <p>a) The ability of the local waste infrastructure to satisfactorily deal with waste from the Proposed Development?</p> <p>Whether any adverse effect is anticipated on the capacity of existing waste management facilities to deal with other waste arisings in the area?</p>	<p>From a Derbyshire perspective if this is for treatment of inert Construction Demolition and Excavation (CDE) waste there appears to be very little local capacity – the Waste Data Interrogator (WDI) contains only one site in High Peak which had a throughput in 2020 of 0.3t and this would appear to be</p>

No.	Reference	Question	Derbyshire County Council Response
			<p>ancillary to the company's main metal recycling activity.</p> <p>More detailed comments on the waste implications of the proposed scheme are set out in the Derbyshire County Council and High Peak Borough Council Local Impact Report</p>
10.6	Pollution control permits and licenses REAC [ <a href="#">REP1-037</a> ] ES Chapter 10 [ <a href="#">APP-066</a> ]	a) With reference to the NPSNN, are the relevant pollution control authorities satisfied that potential releases can be adequately regulated under the pollution control framework? b) Is it considered that the effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the Proposed Development is added would make that development unacceptable? c) Is there any good reason to believe that any relevant necessary operational pollution control permits, or licences or other consents will not subsequently be granted?	a) Yes b) No c) No
10.8	Other policy and factual issues	Are there any other comments with respect to waste management?	Derbyshire County Council has no further comments to make.
11.1 2	REAC [ <a href="#">REP1-037</a> ] Table 2.1 Section 10	The REAC identifies a number of permits required, amongst other things, but not limited to, the control the discharge, or extraction of water and control pollution.	A) Yes B) No C) No

No.	Reference	Question	Derbyshire County Council Response
	ES Chapter 13 [APP-069] NPSNN paragraphs 4.48 and 4.55- 6	<p>A) With reference to the NPSNN, are the relevant pollution control authorities satisfied that potential releases can be adequately regulated under the pollution control framework?</p> <p>B) Is it considered that the effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the Proposed Development is added would make that development unacceptable?</p> <p>C) Is there any good reason to believe that any relevant necessary operational pollution control permits, or licences or other consents will not subsequently be granted?</p>	
11.1 3	Outline EMP [APP-183] Table 6.1	<p>Appropriate arrangements will need to be in place to make provision for the future maintenance of the works. Maintenance responsibilities, including those for drainage infrastructure, are identified in the Outline EMP at Table 6.1. These include, amongst other things, areas of land which would be planted.</p> <p>How would the future maintenance arrangements be secured? Would the local authorities and local highway authorities please confirm that these arrangements are acceptable or, if not, what is needed to make them acceptable?</p>	<p>By the developer.</p> <p>Maintenance arrangements need to be in place before the development can be signed off by the Lead Local Flood Authority.</p>
11.1 7	Sustainable Drainage Systems (SuDS)	NPSNN paragraph 5.115 states that " <i>Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken to</i>	<p>Yes</p> <p>There is always more that could be done, and the Lead Local Flood Authority would be more than happy to</p>

No.	Reference	Question	Derbyshire County Council Response
	ES Chapter 13 <a href="#">[APP-069]</a> (Road Drainage and the Water Environment)	<i>lower flood risk by improving flow routes, flood storage capacity and using SuDS."</i> Does the Proposed Development take the opportunities identified in the NPSNN? Is there anything else that could be reasonably achieved?	discuss this with the design team once the scheme gets to the details stage.  It would be excellent to have this project as a regional exemplar of best practice SUDS within the midlands for highway drainage.
12.20	Biodiversity Mitigation measures ES Chapter 8 <a href="#">[REP1-016]</a> REAC <a href="#">[REP1-037]</a>	Various mitigation measures are proposed by the Applicant. These include, but are not limited to, the provision of structures to shelter bats, a new badger sett, new watercourses, hedgerow and tree planting and crossings of the proposed works for various species.  a) At what point during the construction phase would each of these mitigation measures be constructed?  b) Please could the Applicant explain how long these measures would take to establish before they would provide mitigation?  c) What evidence is there that such measures provide effective mitigation?  d) What measures would be provided to mitigate the effects of the scheme should these measures prove ineffective and how would these be secured?  Do the local authorities have any comments?	Derbyshire County Council has no further comments to make.
13.6	Chapter 5 of Case for the	Do the local authorities have any comments on the Economic Assessment that has been carried out in respect of the Scheme?	A more detailed assessment of the potential economic impacts of the scheme and appraisal of the applicant's Economic Assessment is contained in



No.	Reference	Question	Derbyshire County Council Response
	Scheme [ <a href="#">REP1-036</a> ]		the Derbyshire County Council and High Peak Borough Council Joint Local Impact Report.
13.8	ES Chapter 12 [ <a href="#">REP1-018</a> ] Paragraphs 12.6.43-12.6.46	<p>a) Is there any evidence of environmental factors that are likely to be affected by the Proposed Development contributing to lower life expectancy in Hadfield North or Hadfield South than for England?</p> <p>Please could the Applicant advise how has this been considered in the assessment?</p>	A more detailed assessment of the potential impacts of the scheme on the health and well-being of local communities and appraisal of the applicant's health impact assessment is contained in the Derbyshire County Council and High Peak Borough Council Local Impact Report.
13.9	ES Chapter 12 [ <a href="#">REP1-018</a> ] Register of Environmental Actions and Commitments REAC [ <a href="#">REP1-037</a> ]	<p>The ES identifies several significant adverse effects resulting from the Proposed Development, amongst others the permanent loss/demolition of 25 residential properties and displacement of residents, and effects resulting from construction operations. Such effects have potential to result in stress and affect the wellbeing of persons experiencing them.</p> <p>a) What measures will be put in place for persons to raise concerns about the effects of the works upon them during the lead up to any implementation of the Proposed Development?</p> <p>b) Comment on the desirability of implementing the following measures to provide effective communications between the Applicant and the wider community and to address any items of concern.</p> <p>c) How might they be secured?</p> <p>d) Are any further measures appropriate?</p>	<p>d)In Derbyshire County Council's opinion, the appointment of a Community Relations Manager, establishment of a Principal Contractor Customer Contact Centre and Publication of a Community Engagement Plan would all be beneficial in helping to address concerns about the impact of the scheme on health and well-being of the local community and provide important points of contact.</p> <p>Because this is a highway scheme it is likely that many members of the local community will assume that Derbyshire County Council has responsibility for the scheme which will not be the case. Effective communication with the local community and the County Council by the applicant will be essential therefore</p>

No.	Reference	Question	Derbyshire County Council Response
		<ul style="list-style-type: none"> <li>• The early appointment of the proposed Community Relations Manager?</li> <li>• The early establishment of the proposed National Highways and/or a Principal Contractor Customer Contact Centre?</li> <li>• The development and publication of the Community Engagement Plan and annexing this to the Environmental Management Plan (First iteration)?</li> <li>• In the opinion of the local authorities, would the implementation of any or all of the above measures assist in addressing community and others' concerns/problems during the pre-construction period?</li> </ul> <p>Would there be any benefit in retaining such measures for a period following implementation? If so, for how long?</p>	so that roles and responsibilities for the scheme are clearly identified.
13.1 3	Other policy and factual issues	Do the local authorities have any comment with regard to the effects of the Proposed Development on human health?	A more detailed assessment of the effects of the scheme on public health will be set out in Derbyshire County Council's and High Peak Borough Council's Joint Local Impact Report.
13.1 6	Other policy and factual issues	<p>Are there any other comments with respect to:</p> <ul style="list-style-type: none"> <li>• agricultural land or soils;</li> <li>• local social and economic impacts;</li> <li>• human health;</li> <li>• mitigation and opportunities for enhancement; and</li> </ul>	Comments on the local social and economic impacts, human health impacts and mitigation and opportunities for enhancement will be set out in more detail in Derbyshire County Council's and High Peak Borough Council's Local Impact Report.

No.	Reference	Question	Derbyshire County Council Response
		any other policy and factual issues?	
14.2	Utility infrastructure ES Chapters 1-4 [REP1-014] Chapter 2 paragraph 2.5.30-34	<p>The Applicant has identified the major utilities works and temporary connections required during construction.</p> <p>a) Are any other major diversion or relocation works anticipated within the boundary of the Proposed Development?</p> <p>b) Are any other works proposed through permitted development rights likely to affect the Proposed Development?</p> <p>Is there any reason to suggest that any of those works would be likely to cause an impediment to the planned delivery of the Proposed Development?</p>	Derbyshire County Council is not aware of any existing utilities, but there would be an expectation for the National Highways Design teams to do all the necessary searches prior to their design works.
14.3	Civil and military aviation and defence NPSNN paragraphs 5.55-7	<p>a) With reference to NPSNN, please could the Applicant summarise the steps taken to identify any potential effects on civil or military aviation and/or other defence assets and whether it considers that any are likely to be affected?</p> <p>b) If any may be affected, please could the Applicant summarise the consultations with the Ministry of Defence, Civil Aviation Authority, National Air Traffic Services and any aerodrome – licensed or otherwise – likely to be affected, and the proposed mitigation measures?</p> <p>Are the Local Authorities aware of any civil or military aviation and/or other defence assets that might be affected?</p>	No. Derbyshire County Council is not aware of any civil or military aviation and/or other defence assets that might be affected by the scheme.

No.	Reference	Question	Derbyshire County Council Response
14.4	Safety, security and major accidents and disasters Safety NPSNN paragraphs 3.10, 4.60	a) Are there any comments about whether enough opportunities been taken to improve road safety, including introducing the most modern and effective safety measures where proportionate? Should any other opportunities be considered or taken? If so, what?	Average Speed Cameras for the A57 Snake Pass and the A624 would help to safeguard Derbyshire roads due to increases in traffic flows. Villages of Hadfield and Padfield should also be safeguarded to prevent rat running traffic trying to avoid the strategic road network.
14.7	Other policy and factual issues	Are there any other comments with respect to: <ul style="list-style-type: none"> <li>• common law nuisance and statutory nuisance</li> <li>• utility infrastructure</li> <li>• civil and military aviation and defence</li> <li>• safety, security and major accidents and disasters</li> <li>• cumulative and combined effects; and</li> </ul> any other policy and factual issues?	Derbyshire County Council has no other comments to make.
15.6	Options appraisal	Paragraph 4.27 of the NPSNN states that all projects should also be subject to an options appraisal, which should consider viable modal alternatives. It goes on to advise that national road schemes will have been subject to a proportionate options appraisal as part of the investment decision making process. Further, that it is not necessary for the ExA to reconsider that process if it is satisfied that the assessment has been undertaken. Paragraph 2.21 also advises that relying solely on alternatives such as demand management	No.

No.	Reference	Question	Derbyshire County Council Response
		<p>and modal shift <i>"is not viable or desirable as a means of managing need"</i>.</p> <p>Do the local planning authorities or local highway authorities have any concerns about whether a proportionate options appraisal, including the consideration of viable modal alternatives, has been undertaken?</p>	
15.7	Reasonable alternatives Necessity	<p>Are the local planning authorities or local highway authorities aware of:</p> <p>A) any reasonable alternatives to any compulsory acquisition or temporary possession sought by the Applicant; or</p> <p>B) any areas of land or rights that the Applicant is seeking the powers to acquire that they consider are not needed?</p>	<p>a) No. b) No.</p>
15.1 5	Open space and replacement land Sections 131(5) and 132(5) of the PA2008	<p>Paragraph 7.2.3 of the Statement of Reasons [<a href="#">REP1-010</a>] states that Special Parliamentary Procedure is not required for the acquisition of six open space plots as the plots <i>"are required for the widening or drainage of an existing highway and the giving of land in exchange is unnecessary"</i>.</p> <p>Please could the Applicant justify that statement with reference to s131(5) and s132(5) of the PA2008:</p> <p>a) what uses are proposed for the plots;</p> <p>b) are there any reasonable alternatives; and</p> <p>c) could the giving of other land in exchange be required <i>"in the interests of the persons, if any,</i></p>	Derbyshire County Council has no statutory responsibilities for the provision or displacement of Public Open Space and so has no further comments to make.

No.	Reference	Question	Derbyshire County Council Response
		<p><i>entitled to rights of common or other rights or in the interests of the public”?</i></p> <p>Please could the local planning authorities comment?</p>	
15.1 6	Other Special Category land	<p>Table 7.1 of the Statement of Reasons [<a href="#">REP1-010</a>] identifies various land plots within the Order limits as open space.</p> <p>Does any other land within the Order limits comprise land forming part of a common, open space or fuel or field garden allotment?</p>	Derbyshire County Council has no statutory responsibilities for the provision or displacement of Public Open Space and so has no further comments to make.
15.1 7	Potential impediments	<p>a) Have potential impediments to the development been properly identified and addressed?</p> <p>b) Are there concerns that any matters either within or outside the scope of the dDCO for the development to become operational may not be satisfactorily resolved, including acquisitions, consents, resources or other agreements?</p>	Derbyshire County Council considers that with appropriate ongoing consultation, engagement and discussion with the applicant, all matters within and outside the scope of the dDCO should be capable of being satisfactorily resolved.
15.1 9	Potential impediments	<p>c) Have potential impediments to the development been properly identified and addressed?</p> <p>Are there concerns that any matters either within or outside the scope of the dDCO for the development to become operational may not be satisfactorily resolved, including acquisitions, consents, resources or other agreements?</p>	Derbyshire County Council considers that with appropriate ongoing consultation, engagement and discussion with the applicant, all matters within and outside the scope of the dDCO should be capable of being satisfactorily resolved.