

A57 Link Roads

TR010034

**9.13 Draft Statement of Common Ground
with Peak District National Park Authority**

Rule 8(1)(e)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

January 2022

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

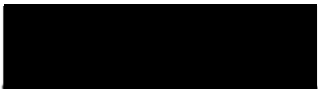
9.13 DRAFT STATEMENT OF COMMON GROUND WITH PEAK DISTRICT NATIONAL PARK AUTHORITY

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Author:	A57 Link Roads Project Team, National Highways and Atkins

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DRAFT STATEMENT OF COMMON GROUND

**This Draft Statement of Common Ground has been prepared and agreed by (1)
National Highways Limited and (2) Peak District National Park Authority**

Signed....  To be signed prior to examination
Andrew Dawson
Project Manager
On behalf of National Highways
Date:

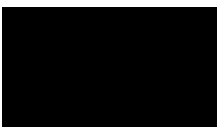
Signed... 
.....
Brian Taylor
Head of Planning
On behalf of Peak District National
Park Authority
Date: 11/01/2022

Table of contents

1. Introduction	5
1.1. Purpose of this document	5
1.2. Parties to this Statement of Common Ground	5
1.3. Terminology	5
1.4. Addressing Rule Six requirements	6
2. Record of Engagement	9
3. Table of issues and matters related to Rule Six Letter Annex E to be agreed	11

1. Introduction

1.1. Purpose of this document

- 1.1.1. This Draft Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A57 Link Roads Scheme (previously known as Trans-Pennine Upgrade) ("the Scheme") and the application ("the Application") made by National Highways Limited ("National Highways") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 ("the Act").
- 1.1.2. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.
- 1.1.3. This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2. Parties to this Statement of Common Ground

- 1.2.1. This SoCG has been prepared by (1) National Highways as the Applicant and (2) Peak District National Park Authority (PDNPA).
- 1.2.2. National Highways (formerly Highways England) became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing the then Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England (now National Highways) .
- 1.2.3. The PDNPA is the statutory Planning Authority for the Peak District National Park area. It is responsible for conserving and enhancing the natural beauty, wildlife and cultural heritage of the Peak District and promoting opportunities for the understanding and enjoyment of the area by the public.

1.3. Terminology

- 1.3.1. In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.
- 1.3.2. It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to PDNPA.

1.4. Addressing Rule Six requirements

1.4.1. The document evidences the meeting of conditions set out within Annex E of the Rule Six letter from the Examining Authority, dated 19 October 2021. PDNPA forms a Category A interested party within the Rule Six Letter as a local planning authority. The SoCG will address the following requirements within Annex E through the associated sections outlined in tables 1.1 below.

Table 1.1: Section Six Letter Annex E Requirement for all category A-D parties

Annex E Requirement	Relevant SoCG section
Applicable legislation and policy considered by the Applicant	1. Legislation and Policy 1.1 dDCO articles and associate schedules 1.2 DCO Requirements 1.3 Protective Provisions 1.4 Other DCO matters
The Applicant’s assessment and the proposed mitigation measures: <ol style="list-style-type: none"> 1. The adequacy of the assessment and mitigation for each environmental topic. Consideration of scope, methodology, study area, receptors and their sensitivity. Baseline conditions, how they were identified and whether all necessary information was obtained given the restrictions during the Coronavirus (COVID-19) pandemic 2. The flexibility sought for the detailed design, construction, and operational phases. Whether the extent of flexibility adopted in the Rochdale Envelope for assessment and evidence is consistent. The extent of the Rochdale Envelope. How the reasonable worst-case scenario has been assessed. 3. The magnitude and duration of construction and operational phase effects, mitigation, opportunities for enhancement, residual effects after mitigation and their significance, monitoring and maintenance. 4. Whether any scoping out of detailed assessment is consistent with applicable legislation and policy, including the National Policy Statement for National Networks and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. 5. Whether the assessment methodology reflects best practice, whether it has been applied consistently, and whether the assessment of significant residual effects is fully evidenced and reasoned o Uncertainty arising from Coronavirus (COVID-19). 6. The application of professional judgements and assumptions. 	2 Assessment and proposed mitigation <ol style="list-style-type: none"> 2.1 Environmental assessment and mitigation <ol style="list-style-type: none"> 2.1.1 Adequacy of assessment for each environmental topic 2.1.2 Adequacy of mitigation for each environmental topic 2.1.3 Methodology 2.1.4 Baseline conditions and coronavirus 2.2 Flexibility and worst case scenario 2.3 Construction and operational effects 2.4 Scoping out of detailed assessment and National Policy Statement for National Networks 2.5 Assessment of methodology and best practice 2.6 Application of professional judgements and assumptions 2.7 Mitigation and outline environment management plan 2.8 Residual impacts and securing of mitigation measures 2.9 Cumulative impacts 2.10 The significance of each residual impact

Annex E Requirement	Relevant SoCG section
7. The need for and adequacy of outline/ draft mitigation and management strategies and plans, including the Outline Environmental Management Plan. 8. Whether the mitigation measures, including embedded measures, are secured and are likely to result in the identified residual impacts, consistent with the Environmental Statement 9. The assessment of cumulative effects and the other plans and projects included in the cumulative impact assessment 10. The significance of each residual impact	
Whether the mitigation identified in the Environmental Statement is adequately secured by the combination of Requirements in the draft Development Consent Order with other consents, permits and licenses	3. Environmental Statement and DCO requirements
The draft Development Consent Order Requirements and associated provisions and documents; whether they are reasonable and relevant to planning and the development to be consented; whether they are enforceable and precise; whether they secure the proposed mitigation and monitoring; and whether any additional provisions are necessary	4. DCO requirements and associated provisions and documents
Matters for which detailed approval needs to be obtained, the proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents, and appeals, including arbitration, and the roles of the local authorities and of other statutory and regulatory authorities	5. Matters for detailed approval
The identification of consents, permits or licenses required before the development can become operational, their scope, management plans that would be included in an application, progress to date, comfort/ impediments and timescales for the consents, permits or licenses being granted	6. Other consents and permits
Opportunities for enhancement and environmental benefits.	7. Opportunities for enhancement and environmental benefits.
Human rights and equalities duties	8. Human rights and equalities duties
Any other relevant and important considerations	9. Any other relevant and important considerations

Table 1.2: Section Six Letter Annex E Requirement for only category A parties

Annex E Requirement	Relevant LPA Issues sub-section
Compliance with local policy and the development plans, impacts on land use and the acceptability of proposed changes to land use	10.1 Compliance with local policy and development plans
The achievement of sustainable development	10.2 Achievement of sustainable development
<p>The matters listed under the following headings in the ExA's Initial Assessment of Principal Issues:</p> <ol style="list-style-type: none"> 1. Transport networks and traffic, alternatives, access, severance, walkers, cyclists and horse riders 2. Landscape and visual, green belt and good design 3. The historic environment 4. Air quality and climate change 5. Noise, vibration and nuisance 6. Soils, ground conditions, material assets and waste 7. The water environment, drainage, flood risk assessment, water frameworks directive 8. Biodiversity, ecological and geological conservation 9. Land use, social and economic, human health 10. Other environmental topics 	10.3 Matters listed under assessment of principles
Whether potential releases can be adequately regulated under the pollution control framework, consistent the National Policy Statement for National Networks	10.4. Whether potential releases can be adequately regulated under the pollution control framework, consistent the National Policy Statement for National Networks
Any other relevant matters included in the ExA's Initial Assessment of Principal Issues	10.5 Any other relevant matters included in the ExA's Initial Assessment of Principal Issues
Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State	10.6 Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State

2. Record of Engagement

2.1.1. A summary of the meetings and correspondence that has taken place between National Highways and PDNPA between December 2017 and January 2022 in relation to the Application, is outlined in Table 2-1.

Table 2.1: Record of Engagement between National Highways and PDNPA

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
20/12/2017 – 02/02/2018	Emails	Consultation undertaken with the relevant local authorities (including PDNPA) on the Landscape and Visual Impact Assessment viewpoint selection.
28/02/2018 – 10/05/2018	Emails	Consultation undertaken with the relevant local authorities (including PDNPA) on the Landscape and Visual Impact Assessment night-time visual assessment viewpoint locations and photomontage locations.
01/05/2018	Meeting	Steering Group Meeting A scheme update was provided, with queries on traffic figures and the format of consultation on the traffic figures. Stakeholders requested to receive the traffic data prior to the release of the information to the public. There were discussions around the Local Impact Report and an update was provided on air quality and noise.
03/10/2018	Meeting	Ecological/Landscape Mitigation/Enhancement Challenge and Review Workshop
21/08/2020	Email	As recommended by Natural England, PDNPA were contacted to review the proposed viewpoints for the LIVA surveys
14/12/2020	Meeting	Meeting arranged to discuss the approach to the setting assessment of the landscape and cultural heritage features.
21/12/2020	Email	PDNPA key areas of concern of designated sites relating to increased traffic flows
26/01/2021	Meeting	Meeting organised to discuss the approach to the indirect effects landscape methodology
28/01/2021	Meeting	Meeting organised to discuss the approach to the setting assessment of the landscape and cultural heritage features. Meeting rescheduled due to lack of attendance from PDNPA and agreed that the applicant would send a briefing note as a basis for discussion, outlining approach instead
19/02/2021	Email	Draft Indirect Effects Methodology issued to the PDNPA for comment
05/03/2021	Email	Comments received from PDNPA on draft Indirect Effects Methodology
16/03/2021	Email	National Highways clarification and response to PDNPA comments on draft Indirect Effects Methodology.
18/08/2021	Email	PDNPA request for missing traffic flow data for select roads
20/08/2021	Email	PDNPA update to update that previously requested data was found, new request for additional road data. Matt Robinson investing sourcing data.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
26/10/2021	Meeting	National Highways (Andy Dawson) established SoCG process and proposed to set up meeting once draft SoCG's prepared.
26/10/2021	Email	Meeting minutes and Monk Road data shared by National Highways

Note: Meeting invites are not included in the table above

- 2.1.2. It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) National Highways and (2) PDNPA in relation to the issues addressed in this SoCG.

3. Table of issues and matters related to Rule Six Letter Annex E to be agreed

Table 3.2: Table of Issues/Matters - Final Version dated 6th January 2022.

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
1. Legislation and Policy					
1.1	Case for the Scheme (APP-182) Environmental Statement (ES) Chapter 1: Introduction (APP-060)	The Scheme has been considered against the main legislative and policy framework relevant to the Scheme	Under Peak District National Park Local Plan heading, Policy T2 is referenced, however, the principle of T1: Reducing the general need to travel and encouraging sustainable transport (part B) is important. Part B states that Cross-Park traffic will be deterred. There is also a lack of reference to the Peak District National Park Development Management Policies (2019). Of relevance is Policy DMT1: Cross Park Roads, which sets out the detailed criteria under which road building within the Peak District might be supported. Whilst the A57 Link Roads scheme falls outside the National Park, Policy DMT1 also provides guidance to how road schemes affecting land within the National Park might be considered.	The Case for the Scheme provides a planning policy context for the Scheme, while ES Chapter 1 provides an overview of the main legislation and policy framework relevant to the Scheme. Topic specific legislation and policy is then outlined within each environmental topic chapters (Chapters 5 to 15) of the ES.	Agreed
2. Assessment and Proposed Mitigation					
2.1 Environmental Assessment and Mitigation					

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.1.1 Adequacy of assessment for each environmental topic					
2.2.1.1	ES Chapter 7: Landscape and visual effects (APP-063)	Indirect landscape and visual assessment methodology	<p>Landscape and visual</p> <p>Following PDNPA request for additional Representational Viewpoints (VPs) the applicant requested confirmation of recommended VPs (email 21st August 2020). Email response confirmed 'subject to on-site verification for actual visibility the additional indirect representative VPs suggested are acceptable'</p> <p>Virtual meeting (9th Dec 2020): Further information is required as to how the impact on the PDNP been assessed.</p> <p>Virtual meeting (26th January 2021): PDNPA agree that the Scheme itself is located outside the park and don't think there will be any major direct effects so the main likely key landscape and visual effects will be indirect effects experienced as a result of changes to (a) traffic volumes, flows, peaks etc and (b) potential signage/highway upgrades on existing routes as a result of the increased traffic volumes). Would like to see clarification from the indirect assessment methodology regarding</p>	<p>The previous approach to the assessment of visual amenity had previously been generally accepted, however as there had been no formal acceptance, the PDNPA were contacted via email (dated 21st August 2020) to confirm the suggestion for the additionally requested representative viewpoints along the A624.</p> <p>Technical leads for the landscape assessment undertook a formal consultation with the PDNPA to agree the assessment of indirect effects in the Peak District National Park (PDNP) and following receipt of comments on the draft methodology (email dated 16th March). Indirect effects on perceptual / experiential effects on scenic beauty, tranquillity, wildness etc) were included within the assessment methodology, which list the Special Qualities of the PDNP. A Scheme Level Landscape Character assessment has been undertaken (Figure 7.3 (APP-092)). A summary of the traffic data (based on the traffic methodology) has been included in Chapter 7 with reader cross reference to the appropriate Appendix. If potentially significant effects were identified in the PDNP, off site measures, e.g. traffic calming, could be explored but that is not within National Highways control. Subsequently, no requirement for off-site mitigation measures has been identified in Chapter 7. It was also confirmed that all planting mitigation would have to be within the DCO boundary.</p> <p>National Highways response to PDNPA Relevant Representation (RR-0677-6) is contained in National Highways response to Relevant Representations (pg. 19 and 20 REP1-042) :</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<p>how the indirect effects of traffic will be assessed (i.e. what thresholds have been used to define a negligible magnitude of change from the change in traffic flows and how these have been applied? e.g. “it is assessed at being negligible effect based on a traffic flow of X”. Concern is the table describing effect magnitude is very generic (‘key loss of elements’ etc) and is not focussed on indirect effects of traffic flows: what is the ‘framework’ used to apply professional judgement to determine the magnitude of effect (and potential significance of effect)?</p> <p>Table describing effect magnitude is generic (‘key loss of elements’ etc) and is not focussed on indirect effects of traffic flows: what is the ‘framework’ used to apply professional judgement to determine the magnitude of change (and potential significance of effect)?</p> <p>Appreciate that you have a methodology to work to. Suggestion to ‘focus’ assessment criteria (look at the particular circumstances/detail of this project) while keeping within your overall DMRB / GLVIA3 framework.</p> <p>Email dated 16th March, follow receipt of draft methodology, provided comments on the approach to assessing indirect landscape and visual effects within the PDNP,</p>	<p>Following a meeting with PDNPA (26 January 2021) a draft indirect assessment methodology was provided to the PDNPA (19 February 2021). The assessment was undertaken by a Chartered and experienced landscape architect within the framework of Design Manual for Roads and Bridges (DMRB) / Guidelines for Landscape and Visual Impact Assessment, 3rd edition (GLVIA3) and was balanced with the assessment of direct effects. GLVIA3 recognises within paragraph 2.23 that ‘professional judgement is a very important part of LVIA. While there is some scope for quantitative measurement of some relatively objective matters much of the assessment must rely on qualitative judgements’.</p> <p>Landscape receptors are landscape designations, Landscape Character Types, and parts of the A57, A624 and A628 within the PDNP. Indirect effects upon the PDNP resulting from increased traffic were assessed. Perceptual/experiential effects were included within the methodology. Paragraphs 7.3.39 and 7.3.40 of the Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063) considered the Special Qualities of the PDNP and tranquillity and wildness. Remoteness was considered as part of the key characteristics of the Dark Peak Landscape Character Area in ES Chapter 7 Table 7.27.</p> <p>ES Chapter 7 Table 7.29 Indirect Effects recognised that traffic numbers will increase for A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity), was not high enough to result in significant effect greater than slight adverse.</p>	

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<p>Potential changes to an increase in traffic flow, and inclusion of mitigation measures (if required and suitable) to address potential significant adverse landscape and visual effects, the identification of residual effects, and identification of landscape receptors.</p> <p>From the PDNPA Relevant Representation (RR-0677-6): We are concerned with how the indirect landscape impacts (increased traffic flow) of the scheme have been assessed. National Policy seeks to ensure that road schemes and their effects are thoroughly assessed to avoid or minimise impacts on NPs. We don't believe that appropriate landscape receptors have been adequately defined at the correct level of detail to determine indirect landscape effects (on character and perceptual aspects such as tranquillity, wildness, remoteness etc) within the PDNP. Where negative impacts have been recognised, 'slight adverse' effects are not considered to be material. In the case of NPs we believe that slight adverse effects are a material consideration. This is particularly pertinent due to the cumulative harm caused by additional traffic flows on what are already busy roads through affected valleys.</p>	<p>National Highways can confirm that the PDNP has been assigned the highest value possible within the ES to meet DMRB requirements (as set out in the ES Table 7.11). The assessment was undertaken within the framework of DMRB / GLVIA3 and was balanced with the assessment of direct effects. While all impacts are a material consideration appropriate weight should be attributed to an impact defined as slight adverse (which is not significant).</p>	

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.1.1.2	ES Chapter 5: Air quality (APP-061)	Assessment of increased traffic flows and the effects of this on nitrate deposition, noise disturbance and collisions with wildlife.	<p>From the PDNPA Relevant Representation (RR-0677-14):</p> <p>Cumulative Impacts</p> <p>Our submission focusses on the indirect impacts of the scheme on the PDNP. Some of these impacts have been assessed as minor or insignificant within the ES. However, we are particularly concerned about the cumulative impacts of the scheme on the following: -</p> <p>(b) Designated sites – increased traffic flows are likely to increase nitrate deposition, noise disturbance and collisions with wildlife. It is of particular concern that the effects of the increase in traffic on the A628 have not been assessed in relation to these impacts.</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-14) contained in National Highways response to Relevant Representations (pg. 19 and 20 REP1-042) :</p> <p>The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with the National Highways Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard, which ensures that the scheme can demonstrate compliance with the NN NPS. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The key traffic change criteria are the flow change criteria - a change of over 1000 AADT and a change of over 200 HDV with the Scheme compared to without the Scheme in the Scheme opening year of 2025. The traffic change criteria has been applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A628 through the Tintwistle AQMA and ecological designated sites. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP-076). The traffic change criteria are not exceeded for the A628 through the Tintwistle AQMA or for sections where there are ecological designated sites adjacent and as a result is not included in the air quality assessment. Where traffic change criteria are not exceeded on roads they are not considered further in the air quality assessment. It is considered that impacts from a scheme on traffic flows below, this criteria is not considered to be significant.</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.1.2 Adequacy of mitigation for each environmental topic					
2.1.2.1	Register of Environmental Actions and Commitments (REAC) (APP-184)	National Highways considers that the proposed mitigation for the Scheme presented within the REAC is adequate for each environmental topic. No off-site mitigation required within the PDNP	See 2.1.1 above in relation to mitigating potential significant adverse landscape and visual effects, and the identification of residual effects. No other specific comments received.	See 2.1.1 above for response in relation to consideration of mitigation measures (if required) to address potential significant adverse landscape and visual effects, and the identification of residual effects. Topic specific recommended mitigation measures are outlined in within each environmental topic chapters (Chapters 5 to 15) of the ES (APP-061 to APP-071), and these are committed to via the REAC. However, no specific off-site mitigation measures in relation to the PDNP are required. Appropriate embedded and essential mitigation measures have been selected in accordance with the mitigation hierarchy (Avoidance and prevention, Reduction and Remediation), which is considered adequate.	Agreed
2.1.3 Methodology					
2.1.3.1	Environmental Statement (ES) Chapter 4: Environmental assessment methodology (APP-060)	Compliance with DMRB standards and relevant best practice methodology guidance	See 2.1.1 above in relation to the assessment of indirect effects. No other specific comments received.	See 2.1.1 above for response in relation to measures taken to agree the assessment of indirect effects on sensitive receptors within the PDNP. The DMRB standards have been used to inform the EIA process and the preparation of the ES. All other relevant best practice methodology guidance used in the technical assessments (Chapters 5 – 15) (APP-061 to APP-071) are detailed within individual chapters as appropriate.	Agreed
2.1.4 Baseline conditions and coronavirus					

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.1.4.1	Environmental Statement (ES) Chapter 4: Environmental assessment methodology (APP-060) Chapters 5 to 15 of the ES (APP-061 to APP-071).	Baseline conditions for assessing direct and indirect effects within PDNP	See 6.1.1 above in relation to agreeing additional indirect representative viewpoints. No other specific comments received.	The baseline for assessing direct and indirect effects for Air Quality, Landscape and visual effects, cultural heritage and noise and vibration within the PDNP, and the study areas for each topic are described in relevant Chapters of the ES. Chapter 4 of the ES provides the approach used to establish and understand of the baseline environment without the Scheme. Where necessary, limitations due to coronavirus has been provided.	Agreed
2.2 Flexibility and worst case scenario					
2.2.3	Environmental Statement (ES) Chapter 4: Environmental assessment methodology (APP-060) ES Chapters 5 to 15: (APP-061 to APP-071).	Dealing with uncertainty in the EIA	No specific comments received.	The Planning Inspectorate Advice Note 9: Using the 'Rochdale Envelope' provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. The Advice Note acknowledges that there may be parameters of a Scheme's design that are not yet fixed and, therefore, it may be necessary for the ES to assess likely worst-case variations, to ensure that the likely significant environmental effects of the Scheme have been assessed. For the EIA, the requirements of the Planning Inspectorate's Advice Note 9 have been reflected and where flexibility is sought in the scheme design, the maximum potential adverse impacts of the Scheme have been assessed. As part of this process, the ES has assessed the maximum dimensions of the Scheme and confirmed that any changes to the development within such parameters, would not result in significant impacts to what has been assessed and/or reported.	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.3 Construction and operational effects					
2.3.1	ES Chapter 5: Air quality (APP-061)	Effects on air quality and designated sites	<p>From the PDNPA Relevant Representation (RR-0677-3):</p> <p>We have concerns regarding the effects of the scheme on the following:</p> <p>1) Air Quality a) Tintwistle AQMA –is acknowledged within the ES, however, there is no assessment of the effects of the predicted increased traffic flows on it.</p> <p>b) Designated sites (A628) – are already subject to high traffic flow and associated Nitrate deposition. Whilst predicted increased flows for 2025 do not meet the 1,000-vehicle threshold, we believe that an assessment of impact should have been undertaken.</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-3):</p> <p>The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with the National Highways Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard, which ensures that the scheme can demonstrate compliance with the NPSNN. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The key traffic change criteria are the flow change criteria - a change of over 1000 AADT and a change of over 200 HDV with the Scheme compared to without the Scheme in the Scheme opening year of 2025. The traffic change criteria has been applied to traffic output from the scheme specific traffic model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A628 through the Tintwistle AQMA and ecologically designated sites. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP -076). The traffic change criteria are not exceeded for the A628 through the Tintwistle AQMA or for sections where there are ecologically designated sites adjacent and as a result is not included in the air quality assessment. Where traffic change criteria are not exceeded on roads they are not considered further in the air quality assessment. It is considered that impacts from a scheme on traffic flows below, this criteria is not considered to be significant.</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.3.2	ES Chapter 6: Cultural heritage (APP-062)	Effects on heritage assets	<p>From the PDNPA Relevant Representation (RR-0677-5):</p> <p>We have concerns regarding the effects of the scheme on the following:</p> <p>b) Heritage Assets (A57) – the increase in traffic on the Snake Pass is significant (38%). The ES (Table 7.32) describes this as a 'slight increase' (VP23) indicating no change to the Special Qualities of the PDNP. Heritage assets are part of the attraction for people to the area. They include the Ladybower Reservoir and a significant cluster of scheduled monuments (Hordron Edge, Bamford Edge, Crook Hill and Bridgend Pasture). Increased traffic flows could impact adversely on the enjoyment and experience of these important monuments within their landscape setting.</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-5):</p> <p>For designated heritage assets, such as the scheduled monuments referred to in the Relevant Representation, that are located along the affected road network (ARN) within the remainder of the Peak District National Park, noise and visual intrusion from the movement of traffic already forms an element of their setting.</p> <p>Noise changes as a result of alteration of traffic levels on the ARN would not generally be perceptible, and as identified in Chapter 11: Noise and Vibration of the Environmental Statement (APP-067) para. 11.9.87, changes in noise along the ARN as a result of the Scheme's operation would be very limited.</p> <p>These limited changes would not result in any impact on the significance of or ability to appreciate the significance of designated heritage assets, including the scheduled monuments identified, along the ARN. No potential for impacts on the setting of designated heritage assets as a result of increased traffic on the ARN through the Peak District National Park has therefore been identified.</p> <p>Viewpoint 23 (approximately 400m from the A57 within the open exposed moorland within the PDNP) is represented in Chapter 7: Landscape and Visual Effects of the Environmental Statement (APP-063), Table.7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP which addresses both tranquillity and wildness. For the visual receptors at this viewpoint location the magnitude of change of increased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity) and was judged to be barely perceptible. The significance of effect is neutral.</p> <p>As per the assessment methodology for indirect effects on the PDNP for landscape and visual (discussed at virtual meeting</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				with the PDNPA on 26 January 2021), the changes in traffic were considered in terms of its effect on landscape and visual receptors not the setting of heritage assets.	
2.3.4	ES Chapter 7: Landscape and visual effects (APP-063) Chapter 11: Noise and vibration (APP-067)	Effects on quiet enjoyment	From the PDNPA Relevant Representation (RR-0677-10): We have concerns regarding the effects of the scheme on the following: b) Effects on quiet enjoyment – existing traffic levels on the A628 Woodhead and A57 Snake Passes have a negative impact on the tranquillity of the surrounding open countryside, with traffic noise being a major feature. Increased levels of traffic along these routes will further reduce tranquillity, especially for those using the trails or footpaths that parallel or cross these busy roads (e.g. Pennine Way, Pennine Bridleway, Trans Pennine Trail (TPT)).	National Highways response to PDNPA Relevant Representation (RR-0677-10): Chapter 11: Noise and vibration of the Environmental Statement (APP-067) includes an assessment of road traffic noise levels from the A628 and A57 with the Scheme and impacts to users of footpaths within the PDNP (paragraphs 11.9.86 to 11.9.89). The modelled operation phase traffic flows on the A628 at Tintwistle and Woodhead through the PDNP were not predicted to cause a perceptible change in noise level in the short or long-term. The A628 is adjacent to the Trans-Pennine Trail and crosses the Pennine Way; impacts on these footpaths would be negligible from changes in traffic on A628. Traffic flows on A57 Snake Pass and A57 Snake Road, which cross the Pennine Way, would increase to give a perceptible noise increase in the short-term, however by the future year the increase would have a negligible impact according to DMRB LA 111 criteria. Therefore noise levels in these areas near the A57 would perceptibly increase in the short-term, and the impact would be limited to within approximately 10m of the road and not the entirety of the PDNP. Landscape receptors are landscape designations, Landscape Character Types, and parts of the A57, A624 and A628 within the PDNP. Indirect effects upon the PDNP resulting from increased traffic were assessed. Perceptual/experiential effects were included within the methodology. Paragraphs 7.3.39 and 7.3.40 of the ES (APP-063) consider the Special Qualities of the PDNP and tranquillity and wildness). There were no	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				<p>significant residual effects on the landscape character areas/types within the PDNP during operation.</p> <p>Viewpoints 19-26 inclusive represent views from the Pennine Way/Pennine Bridleway/Trans-Pennine Trail within the Peak District National Park (PDNP). These were set out in Chapter 7 Landscape and Visual Effects of the Environmental Statement (APP-063) Table 7.29 Indirect Effects. This recognises that traffic numbers will increase for the A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity (the PDNP's Special Qualities)), was not high enough to result in significant effect greater than slight adverse for visual receptors on these routes.</p>	
2.3.5	<p>ES Chapter 7: Landscape and visual effects (APP-063)</p> <p>Chapter 11: Noise and vibration (APP-067)</p> <p>Chapter 12: Population and human health (APP-068)</p>	Effects on severance and tranquillity	<p>From the PDNPA Relevant Representation (RR-0677-11):</p> <p>We have concerns regarding the effects of the scheme on the following:</p> <p>6) Population and health a) Severance –the A628 Woodhead and A57 Snake Passes are crossed at various points by footpaths and trails (see 5b). Crossing points are already difficult and, any increase in traffic for either route is likely to worsen conditions. Loss of tranquillity and increased severance will negatively affect the enjoyment of the PDNP by users of these routes, with an adverse impact</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-11):</p> <p>It is to be noted that there will be no direct construction effects on the A628 Woodhead Road or the A57 Snake Pass and there is no requirement to close, divert or adjust in any way walking routes in this area during this period. It is also important to note that during operation, there will be no diversion of routes, or increase in route length, for WCH in the vicinity of A628 Woodhead or A57 Snake Pass. However, it is recognised that there may be an increase in traffic in these areas. For example, the increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP-185). While this increase in traffic volumes is likely to worsen conditions in respect of road crossing, consideration of the requirements of DMRB LA 112 Population</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<p>on the Authority's second statutory purpose.</p>	<p>and Human Health shows that negative effects are not anticipated to be to a significant level.</p> <p>Chapter 11: Noise and vibration of the Environmental Statement (APP-067) includes an assessment of road traffic noise levels from the A628 and A57 with the Scheme and impacts to users of footpaths within the PDNP (paragraphs 11.9.86 to 11.9.89).</p> <p>The modelled operation phase traffic flows on the A628 at Tintwistle and Woodhead through the PDNP were not predicted to cause a perceptible change in noise level in the short or long-term. The A628 is adjacent to the Trans-Pennine Trail and crosses the Pennine Way; impacts on these footpaths would be negligible from changes in traffic on A628.</p> <p>Traffic flows on A57 Snake Pass and A57 Snake Road, which cross the Pennine Way, would increase to give a perceptible noise increase in the short-term, however by the future year the increase would have a negligible impact according to DMRB LA 111 criteria. Therefore noise levels in these areas near the A57 would perceptibly increase in the short-term, and the impact would be limited to within approximately 10m of the road and not the entirety of the PDNP.</p> <p>Landscape receptors are landscape designations, Landscape Character Types, and parts of the A57, A624 and A628 within the PDNP. Indirect effects upon the PDNP resulting from increased traffic were assessed. Perceptual/experiential effects were included within the methodology. Paragraphs 7.3.39 and 7.3.40 of the ES (APP-063) consider the Special Qualities of the PDNP and tranquillity and wildness). There were no significant residual effects on the landscape character areas/types within the PDNP during operation.</p>	

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				<p>Viewpoints 19-26 inclusive represent views from the Pennine Way/Pennine Bridleway/Trans-Pennine Trail within the Peak District National Park (PDNP). These were set out in Chapter 7 Landscape and Visual Effects of the Environmental Statement (APP-063) Table 7.29 Indirect Effects. This recognises that traffic numbers will increase for the A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity (the PDNP's Special Qualities)), was not high enough to result in significant effect greater than slight adverse for visual receptors on these routes.</p>	
2.3.6	ES Chapter 12: Population and human health (APP-068)	Effects on road safety	<p>From the PDNPA Relevant Representation (RR-0677-12):</p> <p>We have concerns regarding the effects of the scheme on the following:</p> <p>b) Road safety – the ES indicates that the scheme will result in an increase in RTCs along the Snake Pass. Given the geography of the road it's is likely that any collisions are more likely to be severe than slight. The human cost of such events is devastating for those involved. It is also likely that any increase in collisions will require remedial works that will in turn negatively impact on the landscape of the PDNP.</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-12):</p> <p>The Scheme improves journey times along the A57 and as a result it is forecast that some traffic will reroute from alternative routes across the Pennines, including the M62, to take advantage of this. Consequently, the Scheme is forecast to result in an increase in traffic using the A57 Snake Road and the A628 through the Peak District National Park.</p> <p>This Snake Road section (including Snake Pass) of the A57 through the Peak District National Park currently has a relatively poor accident record due to several factors including, the road alignment, frequent adverse weather due to its elevation and a higher than typical proportion of motorcyclists using the road, often for leisure purposes.</p> <p>The accident appraisal for the Scheme assumes that where there are no proposed improvements to a section of road, the accident rate will increase in proportion to the forecast increase in traffic. It is, therefore, the forecast increase in traffic on the</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				<p>A57 Snake Road through the Peak District National Park due to the Scheme that results in the forecast increase in accidents on this section of the A57. However, the forecast increase in accidents equates to less than a 0.3% increase across the appraised road network.</p> <p>The Scheme does not therefore make this section of the A57 inherently less safe.</p> <p>A high proportion (c. 25%) of recorded accidents on the A57 Snake Road through the Peak District National Park involve motorcyclists. Motorcyclists are attracted to this section of the A57 because it offers an exciting and scenic ride due to the twisting alignment of the road through the National Park. The accident appraisal for the Scheme does not account for these very specific circumstances. It is therefore possible that the appraisal overestimates the forecast increase in accidents on this section of road, since it is unlikely that the proposed Scheme will materially change the number of motorcyclists attracted to Snake Road for leisure rides, which is one of the principal reasons for the current high accident rate.</p> <p>Nonetheless, National Highways will collaborate with Derbyshire County Council to investigate what road safety improvements could be introduced on the A57 Snake Road through the Peak District National Park to reduce the potential for accidents in the future. However, any proposed improvements will not be included in the DCO for the Scheme since the A57 through the Peak District National Park is not a National Highways' road. Potential impacts arising from remedial works was not part of the scope of the landscape assessment. No reference to remedial works was made in the DMRB LA 107 standard. Any remedial works on Snake Pass for any reason would be the responsibility of the local highway and local planning authorities.</p>	

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
2.3.7	ES Chapter 14: Climate (APP-070)	Effects on climate change	<p>From the PDNPA Relevant Representation (RR-0677-13):</p> <p>We have concerns regarding the effects of the scheme on the following:</p> <p>7) Climate</p> <p>The ES contains detailed consideration of the physical effects of climate change on the scheme that appear robust and thorough. However, consideration of the schemes contribution to climate change is not analysed with an equivalent rigour. The summary of the effects of the scheme on Climate Change appear simplistic and do not offer an adequate assessment; as it is inevitable that almost all individual site or project-based greenhouse gas emissions will appear insignificant when compared to the National Carbon Budget and reduction targets. By extension, it also suggests that all individual GHG emissions can be ignored due to their relative scale when compared to National Targets; an approach which would not be considered acceptable in other areas of activity. The summary suggests that the scheme in isolation is unlikely to produce significant effects on the climate. However, it should not be considered in isolation but as part of</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-13):</p> <p>Chapter 14: Climate of the ES (APP-070) has been prepared in accordance with DMRB LA 114, the National Policy Statement for National Networks (NN NPS), the Climate Change Act (2008) and subsequent legislation including reporting on the Sixth Carbon Budget</p> <p>The assessment of greenhouse gases across the lifecycle of the scheme has been used to inform mitigation to reduce carbon emissions. Mitigation measures include exploring the potential for low carbon solutions (including technologies, materials and products) to minimise resource consumption and reusing and / or refurbish existing assets to reduce the extent of new construction. Minimising the effects of the Scheme on climate change in this way includes applying the carbon reduction hierarchy: Avoid/prevent, Reduce and Remediate. To fully embed the carbon reduction hierarchy in the project team's ways of working, they have committed to look at ways to reduce carbon emissions across the whole life of the project. Further details of the proposed mitigation measures are provided in section 14.8 of Chapter 14: Climate of the ES (APP-070).</p> <p>Our approach to assessment is in line with the National Policy Statement for National Networks. The NN NPS, Paragraph 5.17 states that applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets. While noting that 'it is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet the targets of its carbon reduction plan targets', Paragraph 5.18 goes on to state that "any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<p>an accumulative process that is changing the climate and damaging the environment. We would suggest that a more local assessment of impact is undertaken to consider the emissions in relation to those who are likely to benefit from the scheme and the immediate area where its impact will be felt, would be more appropriate.</p>	<p>resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets”. As explained in section 14.9.12 of Chapter 14: Climate of the ES (APP-070), the assessment makes a comparison with national carbon budgets and shows that: the overall (net) residual effect of the scheme in the fourth carbon budget period is a 0.0028% contribution to the budget; the overall net effect on the fifth carbon budget will be 0.0017% of the budget; and the overall net effect on the sixth carbon budget will be 0.0033% of the budget. The assessment included in Chapter 14: Climate of the ES (APP-070) concludes that this will not generate a material impact on the UK’s ability to meet its budget.</p> <p>Local Carbon Budgets as defined by local or regional bodies are not defined in the relevant National Policy Statement for National Networks, nor in the Climate Change Act or any dependent legislation. These are not therefore considered to be of relevance when it comes to examining the suitability of the proposed Scheme for its impact on ability to reduce carbon emissions.</p> <p>The assessment of greenhouse gases in the Climate chapter is inherently cumulative because:</p> <ul style="list-style-type: none"> • it considers embedded construction and maintenance, and user tailpipe emissions • the cumulative assessment of different projects (together with the project being assessed) is inherent within the climate methodology through: <ul style="list-style-type: none"> ➢ inclusion of the project and other locally committed development within the traffic model ➢ consideration of the project against the UK carbon budgets, which are inherently cumulative as they 	

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				consider and report on the carbon contributions across all sectors	

2.4 Scoping out of detailed assessment and National Policy Statement for National Networks

2.4.1	ES Chapter 8: Biodiversity (APP-064) Chapter 11: Noise and vibration (APP-067)	Scoping out of A628 Special Protection Area (SPA) / Special Area of Conservation (SAC)	From the PDNPA Relevant Representation (RR-0677-8): We have concerns regarding the effects of the scheme on the following: b) Noise disturbance and wildlife collision – have been screened out for the A628 SPA / SAC. However, increases in traffic, especially HGV's, will create more constant noise and provide less breaks in the traffic, meaning that there is likely to be more potential for collision. The fragmentation of habitat will also lead to more collision risk and fatalities. Increased roadkill will attract more predators and has the potential to impact on ground nesting birds. The increase in background noise generated by additional traffic is also likely to add to the general disturbance of ground nesting birds, potentially reducing the area of usable habitat. We believe that these impacts should be reassessed taking the above into account.	National Highways response to PDNPA Relevant Representation (RR-0677-8): Chapter 11: Noise and Vibration of the Environmental Statement (APP-067) includes an assessment of road traffic noise levels from the A628 during the operation of the A57 Link Roads Scheme. The modelled traffic flows on the A628 through the Peak District National Park were not predicted to cause a perceptible change in noise levels in the short or long-term. This road passes through the Dark Peak SSSI, South Pennine Moors SAC and Peak District Moors SPA. The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make the A628 a more attractive route for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A628, which means that traffic flow, with the Scheme, is forecast to increase. The additional forecast traffic flow due to the Scheme represents approximately an increase from 10,700 to 11,650 in annual average daily traffic (AADT) flow on the A628 by 2025. The Scheme is not anticipated to result in any significant increases in HGVs. With the already high number of vehicles using the roads (10,700 AADT), it is considered that the A628 already has high levels of existing usage with any	Under discussion
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SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				<p>species already habituated to background noise levels and usage, therefore, it is not considered that the modelled increase in vehicles using the A628 within the Peak District National Park would result in significant increases in fragmentation, roadkill, or wildlife collisions.</p> <p>A detailed assessment has been provided within the Habitats Regulations Assessment Screening Report (APP-054) whereby impacts from noise and road collisions were assessed regarding the qualifying species of the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA). Qualifying species (of which are all ground nesting birds) mortality from vehicular collision within the SPA is not recognised as a vulnerability of the European Site and it is anticipated that such species will be habituated to the existing roads that are already heavily used. Therefore, it is not considered that there would be any significant increases in noise and is not considered likely to lead to significant increases in wildlife collision above the existing background level.</p> <p>Any likely significant effects upon designated sites for nature conservation from the Scheme have been screened out within the Habitats Regulations Assessment Screening Report (APP-054) and within the Environmental Statement (APP-058 -073).</p>	
2.5 Assessment of methodology and best practice					
2.5.1	ES Chapter 4: Environmental assessment methodology (APP-060)	Assessment of indirect effects	9th Dec 2020 (Virtual meeting): Further information is required as to how the impact on the PDNP been assessed.	The assessment of indirect visual effects within the Peak District National Park is as per methodology agreed with the PDNPA, is detailed within section 7.3 of Chapter 7 of the ES. It focuses on Landscape Character Types within the Peak District National Park and the routes likely to experience potential	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
	Chapter 6: Cultural heritage (APP-062) Chapter 11: Noise and vibration (APP-067)			<p>changes to vehicular flows as a result of the Trans-Pennine Upgrade Scheme during its operation. These are the:</p> <ul style="list-style-type: none"> • Woodhead Road (A628) • Snake Road (A57) • Glossop Road (A624) <p>For cultural heritage, potential for impacts on Tintwistle Conservation Area were identified in the scoping response from the Peak District National Park and during further consultation undertaken in December 2020. This asset has therefore been included as part of the Cultural Heritage baseline, and the potential for impacts upon its significance as a result of construction and operation of the Scheme assessed.</p> <p>The DMRB standards have been used to inform the EIA process and the preparation of the ES. All other relevant best practice methodology guidance used in the technical assessments (Chapters 5 – 15) (APP-061 to APP-071) are detailed within individual chapters as appropriate.</p>	
2.6 Application of professional judgements and assumptions					
2.6.1	ES Chapter 4: Environmental assessment methodology (APP-060) ES Chapters 5 to 15 of the ES (APP-061 to APP-071).	General assessment assumptions and limitations	No specific comments received	<p>Some qualitative assessments require an approach that is based on professional judgement. This is where decisions made rely on professional experience, perception and opinion of the competent expert undertaking the assessment and is based on knowledge and experience of other similar schemes.</p> <p>Identification of the baseline has included a description of the existing situation and then a prediction of how it is likely to evolve in the absence of the Scheme, i.e. 'future baseline scenario', based on available environmental information and scientific knowledge.</p>	Agreed

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				An acknowledgement and details of any limitations or assumptions adopted for each of the topic specific assessments is provided within each of the technical chapters of the ES (Chapters 5 to 15) (APP-061 to APP-071). The extent to which these limitations and assumptions are likely to affect the assessment outcome (where applicable) is also outlined in the individual environmental chapters.	
2.7 Mitigation and outline environment management plan					
2.7.1	ES Chapter 2: The Scheme (APP-060) Outline Environmental Management Plan (OEMP)(APP-183) REAC (APP-184)	Adequacy of proposed outline mitigation measures and management strategies	See 2.1.1 above in relation to mitigating potential significant adverse landscape and visual effects, and the identification of residual effects. No other specific comments received.	General approach for the Scheme: The full details of the mitigation measures proposed for the Scheme are outlined in the relevant ES chapters (Chapters 5 to 14), the Outline Environmental Management Plan (EMP) (TR010034/APP/7.2) and the REAC. In accordance with DMRB LA 104 Environmental assessment and monitoring, throughout the design process a hierarchy of mitigation actions (Avoidance and prevention, Reduction and Remediation), has influenced approach to the engineering and environmental design. This approach is outlined in full in Chapter 2 of the ES.	Agreed
2.8 Residual impacts and securing of mitigation measures					
2.8.1	Outline EMP (First iteration) (APP-183) REAC (APP-184)	Ensuring proposed outline mitigation measures and management strategies are secured	See 2.1.1 above in relation to mitigating potential significant adverse landscape and visual effects, and the identification of residual effects. No other specific comments received.	General approach for the Scheme: The residual effects, as reported within the technical chapters (Chapter 5 to 14), have taken account of the mitigation measures outlined in the EMP. The Outline EMP for the Scheme outlines how the mitigation and management of environmental effects would be delivered and maintained. It details practices that the appointed Principal	Agreed

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				<p>Contractor is to apply on-site that would demonstrate commitments to environmental management. It details both generic and specifically targeted practices, to enable construction to be undertaken with minimal impact on the environment and would also enable monitoring requirements to be set up. The REAC identifies the environmental mitigation commitments (both embedded and essential), to address potential environmental effects of the Scheme which are identified in each topic chapter.</p> <p>No specific off-site mitigation recommendations have been made within the PDNP as there are no predicted significant residual effects on sensitive receptors within the Park.</p>	
2.9 Cumulative impacts					
2.9.1	ES Chapter 5: Air quality (APP-061) Chapter 6: Cultural heritage (APP-062) Chapter 11: Noise and vibration (APP-067)	Effects on Tintwistle and the Conservation Area	Concerns raised during meeting on 9 th December 2020, arranged to discuss the approach to the setting assessment of the landscape and cultural heritage features included: <ul style="list-style-type: none"> • Visual/setting approach in the PDNP • scheduled monuments (in addition to several non-des assets of value) in the immediate Longdendale landscape to the scheme. • Tintwistle and Langsett Conservation Areas. 	National Highways response to PDNPA Relevant Representation (RR-0677-14): The study area for the assessment of impacts on air quality of the operational phase of the Scheme has been determined in accordance with the National Highways Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard, which ensures that the scheme can demonstrate compliance with the NN NPS. The DMRB LA 105 standard defines traffic change criteria for determining whether air quality impacts can be scoped out or require assessment (DMRB LA 105 paragraph 2.1) based on the changes in annual average daily traffic (AADT) flow, heavy duty vehicle (HDV) flows and speed. The key traffic change criteria are the flow change criteria - a change of over 1000 AADT and a change of over 200 HDV with the Scheme compared to without the Scheme in the Scheme opening year of 2025. The traffic change criteria has been applied to traffic output from the scheme specific traffic	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<ul style="list-style-type: none"> Assets along the A57 extending to Ladybower, and associated impact on amenity. <p>From the PDNPA Relevant Representation (RR-0677-14):</p> <p>Cumulative Impacts</p> <p>Our submission focusses on the indirect impacts of the scheme on the PDNP. Some of these impacts have been assessed as minor or insignificant within the ES. However, we are particularly concerned about the cumulative impacts of the scheme on the following: -</p> <p>a) Tintwistle – increased traffic flows through the village are likely to worsen air quality and noise & vibration; increase severance and effect experience of the TCA.</p>	<p>model to determine the Affected Road Network (ARN). The scheme specific traffic model includes strategic roads, including the A628 through the Tintwistle AQMA and ecological designated sites. The extent of the ARN is presented in Figure 5.1 of the Environmental Statement (APP -076). The traffic change criteria are not exceeded for the A628 through the Tintwistle AQMA or for sections where there are ecological designated sites adjacent and as a result is not included in the air quality assessment. Where traffic change criteria are not exceeded on roads they are not considered further in the air quality assessment. It is considered that impacts from a scheme on traffic flows below, this criteria is not considered to be significant. In Tintwistle, traffic flow increases on New Road and Waterside would lead to perceptible increases in noise in the short-term and long-term. Noise sensitive receptors adjacent to these roads would experience a minor or negligible increase in road traffic noise. Negligible increases are predicted on the A628 Manchester Road and A628 Woodhead Road in the short-term and long-term. No significant effects from vibration would occur.</p> <p>In their consultation response on the Scheme, and during consultation undertaken in December 2020, the Peak District National Park Authority (PDNPA) stated that they would like to see Tintwistle Conservation Area included in the assessment due to the potential for impacts as a result of changes in traffic levels. Concern was also raised by PDNPA regarding the impact of changes to traffic flow within the PDNP and the potential for impacts on the settings of designated heritage assets.</p> <p>The conservation area was therefore included as part of the cultural heritage baseline, and the potential for impacts upon its significance as a result of construction and operation of the Scheme assessed.</p>	

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				<p>The assessment concluded that the operation of the Scheme would very slightly increase traffic on the A628 through the conservation area (refer to Appendix 2.1: Traffic data (APP-151)). No change would result within the conservation area to the north and south of the A628, with the characteristic millstone grit terraces and long views to the surrounding landscape maintained in their current condition.</p> <p>The A628 was originally constructed as a turnpike road in 1800 and has formed an element of the historic townscape of Tintwistle since this time, shaping the growth and development of the settlement. Conservation Area Appraisals produced by both High Peak District Council and the PDNPA recognise traffic on the A628 to form a prominent existing feature of the conservation area in this area. The predicted negligible increase in traffic along the A628 would not result in any perceptible change to this character, appearance or noise environment of the conservation area, which is a heritage asset of medium value.</p> <p>Considered against the criteria for assessment of magnitude of impact presented at Table 3.4N in DMRB LA 104 Environmental Assessment and Monitoring, this would constitute a very minor loss or detrimental alteration to the conservation area, consistent with a negligible adverse impact, as this would not result in a measurable change to the character or appearance of the conservation area.</p>	
2.9.2	ES Chapter 7: Landscape and visual effects (APP-063)	Effects on quiet enjoyment of the PDNP	<p>From the PDNPA Relevant Representation (RR-0677-16):</p> <p>Cumulative Impacts</p> <p>Our submission focusses on the indirect impacts of the scheme on the PDNP. Some of these impacts have</p>	<p>National Highways response to PDNPA Relevant Representation (RR-0677-16):</p> <p>Indirect effects upon the PDNP resulting from increased traffic were assessed including the perceptual/experiential effects. Chapter 7 Landscape and Visual Effects of the Environmental Statement (APP-063) Paragraphs 7.3.39 and 7.3.40 consider the Special Qualities of the PDNP and tranquillity and wildness.</p>	Under discussion

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<p>been assessed as minor or insignificant within the ES. However, we are particularly concerned about the cumulative impacts of the scheme on the following: -</p> <p>c) Quiet enjoyment – increased traffic flow will affect both tranquillity and the quiet enjoyment of the landscape. It is also likely to negatively affect the use of important multi-user routes due to the increased difficulty of using crossing points."</p>	<p>No significant effects were predicted on the landscape receptors within the PDNP. This was because tranquillity and quiet enjoyment is currently compromised by existing traffic and therefore the significance of effect was considered to be neutral.</p> <p>ES Chapter 7 Table 7.29 Indirect Effects recognises that traffic numbers will increase for A57 and A628 (within the PDNP) and decrease for the A624 (within the PDNP) but that for all routes the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity), is not high enough to result in a significant effect greater than slight adverse.</p> <p>Viewpoints 19-27 inclusive are represented in Table 7.32 Indirect Visual Effects on Representative Viewpoints within the PDNP and address both tranquillity and wildness. For the visual receptors at these viewpoint locations the magnitude of change of increased/decreased traffic, based on the existing scenario (whereby existing traffic affects the perception of wildness and tranquillity and quiet enjoyment), was not high enough to result in a significant effect greater than neutral. This is similar to baseline levels. The viewpoints represent visual receptors on the Pennine Way, and Trans-Pennine Trail - NCN62.</p> <p>It is to be noted that there will be no direct construction effects on the A628 Woodhead Road or the A57 Snake Pass and there is no requirement to close, divert or adjust in any way walking routes in this area during this period. It is also important to note that during operation, there will be no diversion of routes, or increase in route length, for WCH in the vicinity of A628 Woodhead or A57 Snake Pass. However, it is recognised that there may be an increase in traffic in these areas. For example, the increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the</p>	

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
				Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP-185). While this increase in traffic volumes is likely to worsen conditions in respect of road crossing, consideration of the requirements of DMRB LA 112 Population and Human Health shows that negative effects are not anticipated to be to a significant level.	

2.10 The significance of each residual impact

2.10.1	ES Chapter 6: Cultural Heritage (APP-062)	Effects on Conservation Area	From the PDNPA Relevant Representation (RR-0677-4): We have concerns regarding the effects of the scheme on the following: Cultural Heritage Tintwistle Conservation Area (TCA) – will see a slight increase in traffic. The ES suggests a ‘non-significant, neutral, residual effect’. This will, however, have an adverse effect on how the TCA is experienced.	National Highways response to PDNPA Relevant Representation (RR-0677-4): In their consultation response on the Scheme, and during consultation undertaken in December 2020, the PDNPA stated that they would like to see Tintwistle Conservation Area included in the assessment due to the potential for impacts as a result of changes in traffic levels. Concern was also raised by PDNPA regarding the impact of changes to traffic flow within the PDNP and the potential for impacts on the settings of designated heritage assets.	Under discussion
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3. Environmental Statement and DCO Requirements

3.1	ES Chapters 5 – 15 (APP-061 to APP-071).	Effects on the Special Qualities of the PDNP	From the PDNPA Relevant Representation (RR-0677-1): The Peak District National Park (PDNP) lies to the east of the scheme; therefore, none of the works have a direct impact. However, the Environmental Statement (ES) raises concerns for the Peak District	National Highways response to PDNPA Relevant Representation (RR-0677-1): The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of	Under discussion
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SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
			<p>National Park Authority (PDNPA) regarding the indirect effects of the scheme. These effects are due to increased traffic flows, principally on the A628 Woodhead and A57 Snake Passes. Forecasts indicate that the A628 Woodhead Pass will see a daily increase in traffic of 850-950 vehicles (2025) and 900-1,100 vehicles (2040); the A57 Snake Pass will see an increase in vehicles of 1,150 (2025) and 1,450 (2040). This growth in traffic may negatively affect the Special Qualities of the PDNP, whilst impacting on the achievement of the Authority's Statutory Purposes (Section 61, Environment Act, 1995).</p>	<p>traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively (Figure 7.6 of 7.4 Transport Assessment Report) (APP-185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road. However, the Scheme overall is forecast to deliver journey time savings across the appraised road network compared without it. Total vehicle kilometres across the appraised road network are also effectively the same with the Scheme as without it. This indicates that the Scheme is not forecast to induce additional traffic on to the road network and that increases in traffic flows on some roads due to the Scheme are balanced out by reductions on other roads because of rerouting or redistribution of some journeys.</p> <p>The effects on the Special Qualities of the PDNP are considered further in the responses below.</p>	
4. DCO Requirements and associated provisions and documents					
5. Matters for detailed approval					

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
6. Other consents and permits					
7. Opportunities for enhancement and environmental benefits.					
7.1	ES Chapter 2 (APP-060) and Chapters 5 to 15 of the ES (APP-061 to APP-071). EMP (First iteration) (APP-183) REAC (APP-184) Case for the Scheme (APP-182)	Identifying opportunities for enhancement measures and environmental benefits	No specific comments received	National Highways considers that the proposed opportunities for environmental enhancement measures for the Scheme are appropriate. These opportunities are outlined in the environmental topic specific chapters of the ES (Chapter 5 to 14), in line with the aims and objectives of the Highways England Licence.	Agreed
8. Human rights and equalities duties					

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
9. Any other relevant and important considerations					
10. LPA Issues					
10.1 Compliance with local policy and development plans					
10.2 Achievement of sustainable development					

SoCG Ref. Number	Relevant examination document	Relevant Issue	PDNPA comment	National Highways response	Status
10.3 Matters listed under assessment of principles					
10.4. Whether potential releases can be adequately regulated under the pollution control framework, consistent with the National Policy Statement for National Networks					
10.5 Any other relevant matters included in the ExA's Initial Assessment of Principal Issues					
10.6 Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State					

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