

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

### **Deadline 5 - response on behalf of High Peak Borough Council**

Responses from High Peak Borough Council are provided in blue to outstanding matters discussed in the hearing session held during the week commencing 7<sup>th</sup> February 2022 in relation to noise and vibration.

#### Base Line Noise Data:

High Peak Borough Council [REP2-053 Q7.8] raised concerns about the lack of baseline noise surveys within its area. The Applicant [REP3-018 paragraphs 8.35 and 8.36] responded at Deadline 3.

#### **c) Does High Peak Borough Council have any outstanding concerns regarding baseline noise surveys?**

Not significant. In response to the previous request that further monitoring should be undertaken to confirm existing baseline noise levels as part of the EMP for the scheme (to ensure that sensitive receptors in the HPBC area are correctly assigned construction noise limit values).

The applicant has stated that Noise monitoring will be undertaken “in the area of 18 and 54 Wooley Bridge” that is representative of these properties.

This is welcomed, but lacks detail at this stage. the EMP e.g Annex B2: Noise and Vibration Management Plan 2.6.3 notes “Woolley Bridge”

#### Night works and Section 61 consent:

The Applicant [REP2-021 Q9.7] said that Section 61 works would encompass all construction activities, including night time works in addition to those report in the ES.

The ExA needs to be satisfied that the assessment considers a reasonable worst-case scenario. The REAC [REP1-037] mentions the potential for Section 61 consent.

#### **g) Please could the Applicant and local authorities comment on the potential for Section 61 works to result in significant effects?**

Section 61 is designed to help mitigate the noise impacts from construction activities by ensuring that they are conducted in line with Best Practicable Means (BPM).

However, it does not mean that there will be no additional impacts or indeed that noise impacts will not be significant, only that the applicant will control these impacts in accordance with BPM.

The issue therefore, is an understanding the potential noise impacts from these various activities, when undertaken in accordance with BPM (e.g assumed embedded mitigation) and crucially the anticipated frequency of these works ( para 1.34 i - ix ), to understand if it should be accounted for in the ES

Typically, if an activity is infrequent or unexpected then section 61 then, it would not be anticipated in would be included in the assessment. However, if some of the activities listed are likely to become embedded, for example, nightly routine equipment maintenance then this should be included. There is also possibly some unknown element to this, as the application of the Section 61 is appears to be at the discretion of the Principal Contractor.

### Mitigation

The Applicant [REP2-021 Q9.12] referred to mitigation measures included in the REAC [REP1-037].

**I) Please could the local authorities comment on whether enough detail been provided of the mitigation measures at this stage, to ensure the assessed mitigation would all be delivered? Should more detail be provided of the need for the extent of monitoring to be consulted on and agreed and on any follow-up actions that might be necessary? Should more detail be set out on the complaints process and interfaces with the local authority?**

All the above is essentially agreed but It is not clear if the level of specific detail required in the REAC, or if this could be achieved by reference/; commitment to approved methodology.

Some of the commitments, notably as monitoring, lack any real clarity or commitment and should be more focussed. As the REAC identifies the environmental commitments made when undertaking the environmental assessment, it is also be expected that all the he assumptions already made within the ES & associated assessments, will be adhered to (e.g if the ES assumes BPM for all activities – then a statement that BPM will be adopted for all activities would be expected) or the associated assessments could be compromised.

### Other environmental topics

#### 7.2 ENVIRONMENTAL MANAGEMENT PLAN : First iteration

The following have been reviewed and the basic principle contained within references are made to standard methodology fine but all lack detail

- Outline Noise and Vibration Management Plan
  - Clarification of monitoring locations and that these represent worst case (just notes Woolley Bridge
  - Clarification of vibration monitoring locations currently this sates Vibration monitoring will take place in proximity to any impact piling activities that occur close to the proposed Mottram Underpass however, it was noted that pilling may be required for the proposed river Etherow Bridge
- Outline Nuisance Management Plan
  - Framework fine but this is quite sparse and rather ambiguous regarding monitoring

- Consideration of flux (or deposition gauges) at high risk sites – these will need deploying prior to the commencement of activities to gain baseline)
- (SECTION 2.53) The general inspection is fine but further detail is required in the event of an “ongoing compliant” and perhaps emphasis placed on a complaint received (from a local authority). The first line should be to address the issue and then progress to finding /correcting the cause. E.g dust from a storage area ... initial corrective action could be a wetting down / mist. Long term correction, improvement of bays or sheeting etc.