

A57 Link Roads

TR010034

**9.54 Applicants comments on Deadline 4
submissions**

Rule 8(k)

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Infrastructure Planning (Examination Procedure) Rules 2010

November 2021

Infrastructure Planning

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The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

9.54 Applicants comments on Deadline 4 submissions

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1. Introduction

1.1.1. This document provides the comments of the applicant, National Highways, in response to the Submissions made at Deadline 4 as requested by the Examining Authority at Deadline 5 in its Rule 8 letter dated 19 November 2021. Comments have been provided on the following documents:

- Derbyshire County Council Written Summary of oral submissions at hearings and post-hearing written submissions requested by the Examining Authority (REP4-010)
- High Peak Borough Council Post-hearing submissions requested by the Examining Authority (REP4-011)
- Carole Hallam on behalf of Sharefirst my Journey to School (REP4-014)
- Environment Agency Comments on Deadline 3 submissions (REP4-019)
- National Trust Post-hearing submissions requested by the Examining Authority in lieu of attendance (REP4-024)
- Peter Simon Comments on the Applicant responses to Deadline 2 submission and comments on the proposed development (REP4-026)
- Stephen Bagshaw Further comments on the Proposed Development in relation to previous Deadline submissions (REP4-027)
- Warner Bower Written Summary of oral submissions at hearings and post-hearing written submissions (REP4-028)
- Keith Buchan obo CPRE PDSY Written Summary of oral submissions at hearings and post-hearing written submissions requested by the Examining Authority (REP4-031)

1.1.2. National Highways has sought to provide comments where it is helpful to the Examination to do so. National Highways has not responded to every submission for instance, because the submission was very short, or because it contained expressions of opinion without supporting evidence. where National Highways has chosen not to comment this is not an indication National Highways agrees with the point or comment raised or opinion expressed

2. Derbyshire County Council Written Summary of oral submissions at hearings and post-hearing written submissions requested by the Examining Authority (REP4-010)

Response reference:	Representation Issue	National Highways Response
9.54.1	n) Please could the local authorities provide written comments on the plan for Deadline 5, on Wednesday 23 February 2022? DCC Written Submission:	No response required
9.54.2	Derbyshire County Council's Landscape Architect has now had the opportunity to review the Landscape and Environment Management Plan.	No response required
9.54.3	No fundamental concerns are raised about the Plan in terms of its approach. The main comments relate to some of the detailed aspects of the plan.	No response required
9.54.4	At section 5.1, a general landscape management objective would be to "Maintain the effective screening of the development where that is a key landscape design objective" – this is to ensure that trees aren't thinned or felled to achieve other objectives for example. This is reflected in the management approach at paragraphs 6.5.3 and 6.5.4 but could be made more explicit in the opening management objectives.	Noted, a management objective will be included to 'Maintain the effective screening of the development where that is a key landscape design objective' Refer to table 5.1 of the updated Outline Landscape and Ecological Management and Monitoring Plan (LEMP) submitted at Deadline 5.
9.54.5	With regard to Table 6.6, the County Council is not convinced that the Native Woodland Mix as proposed reflects woodland typically found in the locality of the scheme or the wider landscape and the Council would urge the applicant and their consultants to review planting and management guidance set out in appropriate landscape assessments such as the 'Landscape Character of Derbyshire' publication (www.derbyshire.gov.uk/landscape) or other relevant documents e.g. habitat creation guides. The County Council would anticipate woodland to be dominated by oak and birch with hazel and hawthorn. Furthermore, sycamore is particularly prevalent along road corridors in this particular area and if it was to be included in a woodland mix, it does offer very quick and effective visual screening. Similar comments apply with regard to proposed native hedgerow mixes.	The species lists within the Outline LEMP have not been confirmed as final. These details will be finalised in the Detailed LEMP prior to the landscaping commencing. DCC (along with the other relevant local authorities) and stakeholders will be consulted on the planting proposals. It is considered that Sycamore is not an ideal species to include in a woodland mix; this is due to its low species habitat provision, invasive potential, and heavy honeydew production. Its existing prevalence is likely to its invasive nature and often sycamore has prolific regeneration in urban areas and along corridors.
9.54.6	With regard to 'Individual Trees' listed at Table 6.18, it is the County Council's view that there are too many species listed, many of which are not characteristic of the immediate or wider landscape and this is very much a case where the statement "less is more" is particularly relevant. Too many trees proposed are of an ornamental or semi-ornamental character, which again is inappropriate for a road scheme that extends primarily through areas of open countryside.	The species lists within the Outline LEMP have not been confirmed as final. These details will be finalised in the Detailed LEMP prior to the landscaping scheme commencing. DCC (along with the other relevant local authorities) and stakeholders will be consulted on the planting proposals. The specification of ornamental and semi ornamental species reflects the character of the suburban areas where the route passes through, particularly at the location of Mottram Underpass.

Response reference:	Representation Issue	National Highways Response
9.54.7	Section 7 deals with 'General Maintenance' during the initial 5- year establishment phase and the County Council is satisfied that this includes all the main maintenance operations it would expect to see in the establishment of newly planted areas.	No response required
9.54.8	At section 7.2.9 and 7.2.10 there is reference to 'Inspection reports' and 'Annual Inspection' but it is not clear from the LEMP who will review the reports and who would attend the annual inspection to ensure all aspects of the scheme are being delivered – It is assumed that there would be some Local Authority involvement in these inspections.	Refer to section 2, Table 2.1 of the updated Outline LEMP submitted at Deadline 5.

3. High Peak Borough Council Post-hearing submissions requested by the Examining Authority (REP4-011)

3.1.1. Given the technical nature of the further clarifications requested regarding the air quality modelling and assessment National Highways has offered High Peak Borough Council a meeting to discuss the outstanding arrangements through statement of common ground arrangements. The meeting is currently being scheduled to take place in early March.

Response reference:	Representation Issue	National Highways Response
9.54.9	<p>Derbyshire County Council [REP2-045] identify potential added benefits for the scheme were it to deliver active travel routes for school routes through industrial estates (Paragraph 15.15).</p> <p>i) How would these routes be secured and delivered?</p> <p>In 2020, High Peak Borough Council developed a draft version of the Glossop Gateway Masterplan. An extract of the draft masterplan is submitted to the examining authority with this response for information. The masterplan is intended to reinforce positive impacts arising from the A57 Link Roads project whilst helping to address any residual negative impacts. It includes a package of measures designed to attract additional investment and generate further economic activities along the A57 corridor, as well as to deliver improvements to the “Glossop Gateway”.</p> <p>The objectives of the masterplan are to:</p> <ul style="list-style-type: none"> • Promote the delivery of planned growth in the area and enhance business rate growth; • Unlock housing and employment growth, providing more certainty to developers of local residential schemes; • Identify proposals to address residual effects of the A57 Link Roads which may affect local quality of life, the environment, health and wellbeing; • Manage local environmental and connectivity improvements by ensuring that new development is framed by high quality green and active travel infrastructure; • Support the delivery of other Glossop and Hadfield town centre benefits; and • Guide balanced and sustainable development <p>In terms of active travel routes, the masterplan identifies a current lack of options for east – west travel. It goes on to state that; <i>“Increased traffic flow through Glossop is also likely to result in delays to pedestrians crossing the main vehicular routes through the town (i.e. severance). As such, an assessment of pedestrian crossing facilities (and an assessment of the type of equipment, to ensure delays to pedestrians and vehicles are minimised) is likely to be needed. There may also be other environmental impacts of traffic on pedestrians that would need to be considered once the updated traffic flows are available, including intimidation</i></p>	<p>National Highways’ notes the emerging masterplan and its objectives, along with the aspirations for active travel routes.</p> <p>National Highways’ designated funds are separate to its core work of operating, maintaining and improving England’s strategic road network. They provide ring-fenced funding that are used to invest in and support initiatives that deliver lasting benefits for road users, the environment and communities across England.</p> <p>Through four designated funding streams, the focus is on making improvements that make the biggest difference. Unlike some of National Highways’ other areas of work these improvements are not specified in advance of the five-year road investment periods. Instead, National Highways’ work flexibly with our customers and stakeholders to invest the funds where they are needed most over the course of the road period.</p> <p>Designated funds cannot be used to provide mitigation for existing or proposed Schemes. It is not considered that the active travel routes are required as mitigation for the A57 Link Roads Scheme and so designated funding streams could be available. That said, in general, where the works proposed are not on the National Highways network it falls to others to fund such works.</p> <p>It should also be noted that, as described in the funding principles set out in National Highways’ <i>Designated Funds Plan for 2020-2025</i>, projects subject to applications for designated funds should “2. Go over and above the traditional focus of road investment; adding value to our customers, local communities and our stakeholders”.</p> <p>National Highways will however continue to liaise with Derbyshire County Council (DCC) and High Peak Borough Council (HPBC) on this matter and will be happy to work with DCC and HPBC on any proposals that may be brought forward to establish whether the designated funding streams could be utilised.</p>

Response reference:	Representation Issue	National Highways Response
	<p><i>(particularly if there are large negative changes in HGV traffic), noise, and air quality.”</i></p> <p>However, it is noted that the scheme does not consider such matters in detail or propose any mitigation in Glossop and Hadfield.</p> <p>The draft masterplan seeks to establish a “green arc” – an access and ecological corridor along the Glossop Brook and River Etherow. This would provide a continuous walking and cycling route between Glossop town centre through to Wooley Bridge and Hadfield linking communities with facilities and employment and connecting up with the Trans-Pennine Trail and Pennine Bridleway.</p> <p>Work on the masterplan was paused in 2020. This was in part due to the lack of published data regarding the impacts of the A57 Link Roads scheme at the time. It is intended to re-visit the masterplan in 2022.</p> <p>The Borough Council and other stakeholders are also supporting an active travel project led by a local community group – Move More Glossop. The project seeks to create a compact and connected town that reduces the need for travel by car and encourages walking and active travel with a view to delivering health, social, environmental and economic outcomes. The proposed routes broadly aligns with the “green arc” of the Glossop gateway masterplan with the addition of a spur to Glossopdale School .</p> <p>Once the masterplan is finalised, an implementation and delivery plan will be developed, identifying a set of key projects that will help deliver. Outline business case proposals for projects that will enhance green infrastructure, pedestrian, cycle and horse-riding connectivity and sustainable travel opportunities in the area may also be developed. Funding sources will also be identified. One potential source of funding is National Highways Designated Funds. The Borough Council has had initial discussions with National Highways regarding the scope for a future bid.</p>	

4. Carole Hallam on behalf of Sharefirst my Journey to School (REP4-014)

Response reference:	Representation Issue	National Highways Response
9.54.10	Response to Issue Specific Hearings A good number of points raised in the SMJTS written submission for deadline 2 have been addressed through the Hearings. Additional questions arising:	N/A
9.54.11	1. Please can the Applicant submit written detail of the additional modelling forecasts conducted and discussed in the Hearing?	Please can the Interested Party clarify which modelling forecasts are being referred to.
9.54.12	2. Is it possible to incorporate community travel into traffic flow forecasts and transport network modelling?	Please can the Interested Party clarify the definition of “community travel”.
9.54.13	3. Since the Hearing, I have personally noted that on a recent journey using the local motorway network following the Hearing, signposts are already erected indicating implementation of GMCAZ on 30th May 2022. Residents and businesses both within the proposed boundary for the GMCAZ and external to the boundary have seen little or no published information about the GMCAZ proposals, and remain confused about timing, costs, how it will run and be managed, boundaries and impact to High Peak residents and the A57 Link Roads Scheme. When will firmed up, detailed proposals for GMCAZ be available?	The Greater Manchester Clean Air Zone (GMCAZ) is the responsibility of the Mayor of Greater Manchester and the Greater Manchester Combined Authority. National Highways understands that the Mayor of Greater Manchester and the Greater Manchester Combined Authority are working with Department for Environment, Food and Rural Affairs to meet the Greater Manchester and Government requirements on clean air, as soon as possible, and no later than 2026.
9.54.14	4. When will an Electric Vehicle trajectory for take-up be available to assist with carbon impact assessments, carbon budgets and help continue to secure and underpin delivery of the national commitments to Net Zero?	As set out in National Highways’ response to Examining Authority’s Written Question 14.9 (REP2-021) the Scheme has used traffic activity projections from the Department for Transport (DfT) (RTF 2018) and DfT car sale projections (April 2019) which include forecasts of the uptake of electric and hybrid electric propulsion systems. The assessment of operational road traffic related carbon emissions presented in the ES Chapter 14 Climate [REP1-019] applied National Highways speed band emission rates, current at the time of assessment (based on Defra Emission Factor Toolkit (EFTv10.1)). Defra published an updated Emission Factor Toolkit in November 2021 (v11). Updated operational road traffic related carbon emissions using EFTv11 will be published by National Highways at Deadline 5 in response to Issue Specific Hearing 2 Item 6c and d. This will also include a sensitivity test to account for the impact of the policy measures set out the Government’s Transport Decarbonisation Plan (TDP) published in July 2021, which sets out the Government’s aspirations to decarbonise transport to support the wider approach to achieving Net Zero by 2050.

5. Environment Agency Comments on Deadline 3 submissions (REP4-019)

Response reference:	Representation Issue	National Highways Response
9.54.15	<p>REP3-005 and REP3-024 – Flood Risk</p> <p>We have reviewed the revised FRA ref: TR010034/APP/5.5/Ver2 dated January 2022(REP3-005 and REP3-024 in the document library).</p> <p>The FRA has not been updated to reflect the latest fluvial climate change allowances that were introduced in July 2021. We acknowledge that a considerable amount of design work was undertaken by the applicant prior to the July 2021 update, and it is unfortunate that the updated guidance was introduced soon after the first draft of the FRA was made. The compensatory flood plain storage within the FRA is based on 1% AEP 35% climate change allowance which was consistent with the guidance prior to July 2021. The revised guidance for the Upper Mersey management catchment suggests at least 41% should be considered for compensatory floodplain storage and 53% if essential infrastructure is present in the area affected. We have advised that the river modelling that informs the risk assessment for the proposed crossing of the River Etherow and associated flood plain compensation be reviewed.</p>	<p>A review of flood risk to and from the Scheme based on the latest EA climate change guidance from July 2021 is being undertaken as part of Scheme’s Detailed Design and an updated FRA will be provided at that stage which will support the submission for environmental permitting.</p> <p>The new climate change values to be incorporated into the modelling for the detailed design will be agreed with the EA through the Statement of Common Ground process.</p> <p>Furthermore, the Applicant has approached the EA to set up a meeting to discuss the items that are currently ‘under discussion’ in the draft SoCG submitted to the ExA at Deadline 2. The aim is to hold this meeting in the first or second week of March, well in advance of the second round of hearings.</p>
9.54.16	<p>Section 4.6 – River Etherow</p> <p>The river modelling undertaken for the River Etherow crossing is discussed in section 4.6 of the FRA. Our river modelling specialists within the Environment Agency’s evidence and risk team have reviewed the applicant’s model on two occasions in the past. The most recent review was in March 2020. Although the applicant had made some progress at that time to produce an agreeable model to use in the risk assessment, there were some remaining questions regarding the detail of the river model constructed. These were raised with the applicant in March 2020 and again in November 2021. To date we have received no further updates to the flood risk modelling since our last discussions with the applicant in a meeting on 25th November 2021. It is not clear at this time whether the applicant intends to address these points we have raised previously. We believe these detail issues in relation to the river modelling for the River Etherow should be addressed to ensure a robust assessment offlood risk. However, we would point out that requesting our river modellers to undertake a detailed river modelling review normally takes approx. 4 weeks.</p>	<p>The comment received from the EA on the flood model will be addressed within the Detailed Design stage on the Scheme. Once the design has been finalised, the EA will be consulted on the revised version of the model and the model will be amended accordingly.</p> <p>The Applicant’s understanding from previous correspondence with EA dated 12 March 2020 was that the changes made to the model were satisfactory and no further edits to the model were required at this stage. As the detailed design progresses and further changes are required to the model, comments received from EA on the model will be addressed during the Detailed Design stage and submitted for further review.</p>
9.54.17	<p>Section 2.3.15 – Flood Risk Assessment</p> <p>We also note from section 2.3.15 of the FRA that there is currently no information on the proposed surface water drainage strategy for the proposed development. This is more within the realm of Lead Local Flood Authorities in their role of assessing development drainage and surface water run-off. With any flood risk assessment, it would be normal practice to see outline information on anticipated receptors for drainage and how run-off rates would be controlled, preferably incorporating sustainable methods of drainage.</p>	<p>The Drainage Design Strategy report (APP-188) was submitted as part of the DCO submission and is publicly available on the Planning Inspectorate’s website.</p>
9.54.18	<p>Land Contamination [REP1-041]</p>	<p>The risk of negative impacts on private water supplies due to dewatering has been assessed in the Scheme’s Hydrogeological Risk Assessment (REP3-025) which was submitted in January 2022 to the Environment Agency for review. The Hydrogeological Risk Assessment details the Applicants’ conceptual understanding of the hydrogeological environment and the results of groundwater modelling which is being used to assess</p>

Response reference:	Representation Issue	National Highways Response
	<p>The Environment Agency have concerns, which have been raised with the Applicant previously, regarding the dewatering of the below ground level structures (cutting, underpasses etc.) in some locations could artificially dewater natural aquifer body.</p> <p>These groundwater bodies are known to provide sole supplies of water (from an abstraction borehole) to several private dwellings. Dewatering of the aquifer would therefore deprive the owners and abstractors of these boreholes of water.</p> <p>The applicant needs to have a thorough understanding of the environmental conditions prior to the drainage strategy being developed and the construction of the road commenced to be able to satisfactorily inform the Environment Agency.</p> <p>We requested a survey of water features in the area (as detailed in email exchanges from (WJ Group – Environment Agency April -July 2021) [which would have included identification of abstraction boreholes; springs, wells, and other relevant boreholes; surface water courses and other water features such as ponds, lakes, and reservoirs] but to date we don't appear to have received any of these details.</p> <p>It is critical for the Environment Agency to undertake a thorough review of the technical reports to develop a detailed understanding of the natural environmental conditions, which are already complex and challenging so that we can work with the Applicant to develop a strategy that will address the need to drain and dewater the sub-ground level structures yet protect the natural environmental conditions and the established users of the groundwater resource.</p> <p>The natural chemical conditions of the groundwater bodies may adversely impact the surface water network if the drainage/dewatering liquid were to enter them. This was raised with (WJ Group) on 7 May 2021, along with the known chemical condition of the aquifer which prevented the applicant from placing abstracted water into the surface water network and was given as written evidence to the inquiry on the morning of the 10th of February 2022 (Session 3; Time stamp 05:48 to 08:34).</p> <p>We look to continue to work with the applicant to find a successful outcome that can be implemented and, where necessary subject to the controls of an environmental permit.</p> <p>We note there is time set aside for further hearings 5th – 7th April. Therefore, can we request the ExA list a hearing to allow the issues of Flood Risk and Land Contamination to be addressed. If it appears everything has been resolved/addressed by that time, then the hearing will probably not be needed.</p>	<p>impacts on surface water / groundwater receptors and inform dewatering design during construction (active) and operation (passive).</p> <p>A Water Features Survey for the Scheme was completed in 2019. A desk study update to this survey, that included the latest data from the Tameside Metropolitan Borough Council private abstractor register, was completed in 2020. The results were included in Environmental Statement (ES) Chapter 9: Geology and Soils (APP-065) and Chapter 13: Road Drainage and the Water Environment (TR010034/APP/6.3 (3) submitted at Deadline 5). Potential impacts due to dewatering on identified receptors have been assessed in the Hydrogeological Risk Assessment – flow impacts on surface water receptors are summarised in Tables 4.2 and 4.3 of the Hydrogeological Risk Assessment, flow impacts on groundwater receptors are summarised in Tables 4.4 and 4.5.</p> <p>The risk of negative impacts on surface water quality due to discharge of groundwater during dewatering has been assessed in the Scheme's Hydrogeological Risk Assessment which has been submitted to the Environment Agency for review. This includes a comparison of the water quality of groundwater samples against Environmental Quality Standards (EQS) – see Section 4.6.</p>

6. National Trust Post-hearing submissions requested by the Examining Authority in lieu of attendance (REP4-024)

Response reference:	Representation Issue	National Highways Response
9.54.19	<p>Item 8: Other Specific Issues This section of the Hearing Agenda includes the following: Land use, social and economic, human health Local social and economic impacts Concerns have been raised regarding the effect of increased traffic volumes on Snake Pass affecting land stability on the route, and that this could lead to disruption of the business of the National Trust and its tenants. Similarly, concerns have been raised of the potential for increased traffic volumes on Snake Pass to increase the risk of wildfires. The Applicant has sought to address these concerns in their response at Deadline 3. g) Would the National Trust, High Peak National Park Authority and Derbyshire County Council submit any comments that they wish to make in the light of the Applicant's response for Deadline 4.</p>	
9.54.19	<p>National Trust response:</p> <p>National Trust's Tenants use access points on the Snake Pass on a regular basis, including for movement of agricultural vehicles and livestock. The safety and reliability of the road is therefore of considerable interest to the Trust. In response to the Written Representation of the National Trust, National Highways states that it will 'collaborate with Derbyshire County Council to identify potential measures to improve road safety on the A57 Snake Road/Pass'. The response goes on to state that 'If a suitable scheme to address the current issues being encountered along the A57 Snake Road/Pass can be identified, then National Highways will look to support DCC throughout the Designated Funds allocation process'. It goes on to state that 'All applications will need to demonstrate compliance with the required assessment criteria'. It appears that there is some uncertainty around whether a suitable scheme can be identified and subsequently delivered through Designated Funds. The feasibility of addressing road safety issues in this way ought to be established as soon as possible. We believe that improvements/traffic restraint on the A57 should be delivered at the same time as the scheme in order to effectively mitigate its impacts.</p>	<p>National Highways' designated funds are separate to its core work of operating, maintaining and improving England's strategic road network. They provide ring-fenced funding that are used to invest in and support initiatives that deliver lasting benefits for road users, the environment and communities across England.</p>

Response reference:	Representation Issue	National Highways Response
9.54.20	<p>Should the measures to improve road safety include average speed cameras (or other physical infrastructure) as has been suggested by Derbyshire County Council then these are likely to impact on the landscape and views within the National Park. The impact of such infrastructure may also benefit from landscape mitigation to ameliorate landscape/visual impacts. It would therefore be helpful to know whether the Designated Funds landscape theme criteria would allow for associated applications for landscape/visual mitigation associated with the scheme, and whether National Highways will also provide support to any landowner seeking to utilise this fund for landscape/visual mitigation. If any sites being considered for physical infrastructure are located on or adjacent to National Trust land then we would also wish to be involved in these discussions.</p>	<p>Designated funds cannot be used to provide mitigation for existing or proposed Schemes. Additionally, in general, where the works proposed are not on the National Highways network it falls to others to fund such works.</p> <p>The funding principles are set out in National Highways' <i>Designated Funds Plan for 2020-2025</i>¹, and confirm that projects subject to applications for designated funds should: "2. Go over and above the traditional focus of road investment; adding value to our customers, local communities and our stakeholders"; and "12. Be on the Highways England estate or have a clear relationship with it".</p> <p>National Highways will continue to liaise with Derbyshire County Council on this matter and will be happy to, where appropriate, work with DCC on any proposals that may be brought forward.</p>
9.54.21	<p>Specifically in relation to paragraph 3.2 (impact of land slip and road maintenance/closures on National Trust tenants), National Highways states that 'National Highways considers that this is a matter between Derbyshire County Council and the National Trust'. While we accept that land slip issues are not a result of the A57 DCO scheme, we are nevertheless keen to ensure that the Examining Authority is aware of this ongoing issue which may affect the future operation of the A57 Snake Pass, along which the scheme is modelled to direct more traffic.</p>	
9.54.22	<p>For completeness, we also wish to respond here to National Highways response to paragraphs 6.1-6.3 of National Trust's Written Representation (Opportunity for biodiversity mitigation and enhancement), which is as follows: 'As per National Highways' Relevant Representation response to RR-0620 (REP1-042), the opportunity to discuss off-site enhancement opportunities with the National Trust is welcomed. However, it should be noted that any commitment to these enhancements will sit outside the DCO application'.</p>	
9.54.23	<p>We would welcome a conversation with National Highways about habitat restoration work on the High Peak Moors adjacent to the A57. We do, however, wish to note that we do not believe this opportunity could be pursued through the</p>	<p>National Highways is in dialogue with the National Trust about the A57 Link Roads scheme and will continue to discuss this matter further.</p>

¹ <https://nationalhighways.co.uk/media/lh2ll0ao/designated-funds-plan-2020-2025.pdf>

Response reference:	Representation Issue	National Highways Response
	Designated Funds bid process (i.e. it is unlikely to meet criteria) due to the restrictions placed on National Highways to claim biodiversity net gain units on designated sites, such as SSSIs, SPAs and SACs. We request that National Highways makes an approach to the National Trust via its regional Planning Adviser (Kim Miller) and Senior Estate Manager (Matthew Pocock) to discuss options for funding and delivery.	

7. Peter Simon Comments on the Applicant responses to Deadline 2 submission and comments on the proposed development (REP4-026)

Response reference:	Representation Issue	National Highways Response
9.54.24	<p>1. Further comments on AQMA impact assessments</p> <p>There is a policy burden on the Applicant for compliance in relevant AQMAs which neither an overall improvement in AQ across the scheme or mitigation will remove and is critical in the final decision making for the Scheme. The relevance of the AQMAs in Glossopdale is now an open question at this examination. The Applicant maintains that “screening out” removes the relevance of Glossopdale AQMAs for scheme assessment purposes. The Applicant also maintains in a response to my D2 WR that traffic diversion whether natural or enforced plays no part in their DM/DS “screening out”. “The Scheme specific traffic model used in the air quality assessment did not include any assumptions around traffic routing to mitigate the potential for adverse effect on AQMAs in the local area”. (Page 19 Comments on WR_D3_260122)</p> <p>However the TAR document suggests otherwise- “Dinting Road - in conjunction with Shaw Lane, Dinting Road is an alternative route to the A57. It is important to capture possible alternative routes when assessing the impact of the Scheme on the A57 (Paragraph 2.2.5 000123 -7.4Transport Assessment Report) . This TAR statement acknowledges the importance of traffic diversion as regards impact assessment on the main road so further specific clarification from the Applicant is required. Particularly what “impacts” do they mean here and why they are not relevant to DS traffic increases that they have used to ascertain the screening threshold?</p> <p>I have previously submitted that the anticipation of such diversion may be wholly unrealistic and so would suggest there is a compelling need for the A57 being re-modelled with minimal diversion beyond current and DM levels to establish probable true “impacts”. In the referenced response the Applicant seeks to dismiss ground level evidence supplied by myself and others that demonstrated there are impediments to further traffic filtering further through “North Glossopdale” (Footnote *): “The traffic modelling used to assess the Scheme has been calibrated and validated using observed traffic data to ensure that it reflects as accurately as possible the operation of the road network and accounts for existing capacity constraints on each link and at each junction.” (Pages 18 and 19 Deadline 3 Submission - 9.38 Applicants comments on</p> <p>Written Representations). However as the Inspectors will have seen for themselves on a site visit made at the turn of the year the constraints and impediments I described in detail are very real and certainly do exist. (Unaccompanied Site</p>	<p>The traffic modelling used to assess the impacts of the Scheme utilises a strategic reassigned model. This model dynamically reassigns traffic to alternative routes based on the comparative benefit for users of different available routes until model equilibrium is reached. The benefit to users is based on a combination of the quickest and lowest cost route (approximately 70% journey time and 30% user costs for fuel and vehicle maintenance). The assignment of traffic in the traffic model therefore accurately represents the likely routing of traffic in response to changes in the road network due to the Scheme in terms of both layout and junction delay/congestion. Therefore, the traffic model accurately forecasts the changes in traffic flows due to the Scheme, including on the A57 through Glossop and on Dinting Road and Shaw Lane, on which the air quality assessment is based.</p>

Response reference:	Representation Issue	National Highways Response
	<p>Inspection – 12 to 14 January 2022) They exist quite as much the data from the NH junction surveys which the Applicant feel gives them cause to disagree. So again there is an unresolved difference over the evidence for further capacity here.</p> <p>In view of that uncertainty a precautionary principal on all health and safety grounds would require that the A57 should be re-modelled to openly consider the strong prospects of minimal diversion beyond the levels of today. Also as other parties (CPRE (ISH2 Item 6 “Climate Change” - Footnote ****) are doubting the year of baseline evidence supplied to the model and vital legal policy thresholds are in question, such an alternative model might become very necessary and significant indeed and so would be justified on that basis alone. I feel therefore it should be commissioned now for Examination purposes.</p>	
9.54.25	<p>2. This submission considers and builds on a point of IP Mr Bagshaw at the recent ISH where he raised particular impacts threats to areas in North Glossopdale with high designations of protection. Mr Bagshaw highlighted that an enlargement of traffic flow filter expectation here does not properly reflect the limited junctions at the A57 thereby raising the reasonable prospect of rat run diversions through the Conservation areas of Padfield and Old Glossop that potentially link to the A57. Derbyshire CC the Highways Authority have in part specifically raised this very concern in their response to Inspector’s WQs regarding Padfield (Page 52, Q14.4 Submission - Response to the Examining Authority’s First Written Questions (WQ1)). Strangely this was not dealt with despite their representatives attending the ISH2 (Item 3 Transport Networks - Mr Blissett) and this also remains “unresolved” at Examination. These are plausible threats to sensitive and protected assets where a significant DS traffic level rise would not be acceptable.</p>	See National Highways’ response reference to 9.54.24 above.
9.54.26	<p>3. Mr Bagshaw and Mr Wimberley also raised a matter of “disenfranchisement” re the “Hadfield Alternative” concept at the ISH which merits elaboration. It was pointed out that certain documents known as “BBA” exist that inform the Scheme core documents, generally on a quite repeated “cut and paste” basis, but were available only at a late stage in the Examination in “secondary form” from an IP submission.</p> <p>(Page 115 CPRE Deadline 2 Submission - Cover Letter, Trans-Pennine Upgrade Stage 3 combined modelling and appraisal report, A57 Economic appraisal package, A57 Transport modelling package and A57 Transport forecasting Package reports).</p> <p>7.1.1.</p>	<p>The Hadfield Alternative, is not an alternative scheme. It is an existing alternative route, or rat-run, via Dinting Road and Shaw Lane in Glossopdale that traffic currently uses to avoid traffic congestion and delay on the A57 through Glossop. This route is included in the traffic model to ensure that it accurately reflects the network of available alternative routes within Glossopdale and therefore, properly accounts for any rerouting of traffic due to the Scheme.</p> <p>Also see National Highways’ response reference to 9.54.24 above.</p>

Response reference:	Representation Issue	National Highways Response
	<p>The Applicant's approach in withholding these documents therefore becomes an issue and one I understand several other IPs wish to have raised and scrutinised as well as myself. There is strong doubt that without their full earlier production of BBA documents core evidence like the TAR has been sufficiently explicable to allow independent non NH scrutiny as the DCO process might require. It comes across as being written in a sort of code where with the root documents withheld, the Applicant alone can hold the key. The only existing NH peer review has very limited assurance having been only an internal one. (ISH2 Item 6 Climate Change, various NH representatives including Mr Catesmark and others)</p> <p>7.1.2.</p>	
9.54.27	<p>4. A further issue of "disenfranchisement" needs to be highlighted here based on Mr Bagshaw's observation about a traffic nuisance and safety threat to the Conservation areas. The Applicant somewhat controversially chose to hold the required Consultation during a critical pandemic starting in November 2020 and attempted to mitigate the obvious shortcomings through compensatory distribution of alert/response mailshots to most households within Glossopdale. Notably however they excluded - simply on the basis of cost - the Conservation areas of Padfield and Old Glossop. Noting the concern of IPs (statutory and non statutory) I feel this is an important new additional issue for the Examination to consider. As a resident of one of these areas I raised the matter with my local Ward Councillor (Footnote **) at the time who expressed equal concern and advised that when HPBC/DCC had made CG representations on this the Applicant was dismissive of the relevance of these Conservation areas as being outside the affected area. Meanwhile Mr Bagshaw has very plausibly offered evidence to suggest otherwise.</p>	
9.54.28	<p>5. Further there is a major issue with regard to the Applicant's approach to the element of the traffic filter through North Glossopdale, in that it generally lacks clarity. The Applicant has again taken inconsistent positions about this as I described in my first paragraph yet there is no doubt that the ES Traffic Data document identifies additional traffic somehow significantly filtering through the settlement. (6.5 Environmental Statement - Appendix 2.1 - Traffic Data). Also there are references to possible filter routes in the TAR, and lurking in the CPRE submission of "BBA" or "Routes to Market documents" there is something called the "Hadfield Alternative" including an illustrative map.(Page 115 CPRE 3 combined modelling and appraisal report, A57 Economic appraisal package, A57 Transport</p>	<p>National Highways has taken a consistent approach to the element of traffic filter through North Glossopdale as explained in response reference to 9.54.24 above.</p>

Response reference:	Representation Issue	National Highways Response
	<p>modelling package and A57 Transport forecasting Package reports) (Map on Page 117, Figure 2-6- ibid -)</p> <p>7.1.3.</p> <p>There have been comments at the Examination (ISH2 Item 3 Transport Networks Mr Blissett) that there is no need on the Applicant's part to model this "black hole" but the matter is otherwise, because as stated modelling already exists, it is just that it requires completion. It is reasonable in view of the fragment supplied to request the whole so as to be appropriately informed as to where the traffic is envisaged as being able to freely flow without serious detriment to the locality. At the moment this information is not properly forthcoming and is worrying thin. It is hardly good modelling practice to submit plans that suggest a route at one end only, because this leaves the area open to a random number of risks. One such is described below.</p>	
9.54.29	<p>6. The Applicant has suggested there is a limited scope area for this Examination, and as above with the Consultation, so offering no recognition of the high level environmental sensitivity around beyond the immediate boundary of scheme. In part this limitation been recognised by the Inspectors when they undertook a site visit</p> <p>unaccompanied in mid January to a Padfield Main Road layby which I suspect is that maintained by United Utilities. They have raised the matter of scheme visibility from this vantage point adjacent to the Conservation areas and the National Park. Were they to attend later this spring they would have found themselves within a major breeding ground for lapwing a "red listed species" in the UK. The UK government allocates significant budgets on national projects to try and protect the ever- shrinking breeding grounds of these diminishing "wetland waders" so it is not a minor concern. Whether or not this might or might not be a major biodiversity issue can only be established if the Applicant offers greater clarity over how the Scheme's envisages in full that traffic is to filter through North Glossopdale. This model should be put in place</p>	
9.54.30	<p>7. Beyond this, yet another separate matter of disenfranchisement arises within the NH application process, which is an offer in principal and outline from NH, in answer to the joint HPBC/DCC LIR A57 Shaw Lane Junction 3 concerns, for undefined (infrastructure) works. (Page 14 -</p> <p>). The nature and extent of this offer is unclear, but it is reasonable to ask why such a proposal, if any way integral to the scheme, is not included in the case proposed</p>	

Response reference:	Representation Issue	National Highways Response
	in full so that it can be examined? This again seems questionable practice of consultative marginalisation of the interest of relevant citizens and parties.	
9.54.31	<p>8. Finally I would return to the matter of the nearby Godley Green Garden Village proposal. In my D2 Submission with reference to NPPF protection for Green Belt I raised that this NH Application coincides with the TMBC GGGV Application, so cumulatively amounting to the removal of circa 150 hectares of Green Belt. Also I noted that both Applications rely upon “exceptional circumstances” so effectively the Secretary of State may have to breach the GB statutory planning designation to approve either. “Exceptional” means “the rarest” of circumstances a condition which cannot be claimed for these closely neighbouring schemes, which form a significant parcel of contingent Green Belt within one Borough Planning Area . This question is yet to be addressed.</p> <p>National Highways responded by addressing a different aspect of this question which was the consideration of traffic impacts that would be generated by the sizeable Godley Green application for over 2k dwellings. Firstly they wrote “This site lies entirely outside the boundary of the Scheme, separated from it by existing urban development,” which is a misrepresentation. (P22 - comments on Written Representations).</p> <p>My D2 Submission shows clearly the Garden Village settlement proposal presents and relies upon direct access points about 2km away onto the A560 Stockport Road (aka Mottram Old Road) which is a primary route distinct from any urban area it might pass through. The GMCA “Places for Everyone” draft TAR indicates clearly the intention for its traffic in significant numbers to link to the existing Junction 4 M67 Roundabout, the Western start point of the “Scheme”. It is important therefore to consider the capacity and design of the Scheme for accommodating such traffic which may be predicted to be mainly to the West, but realistically with the Scheme in place might go in either direction. NH do in fact acknowledge this elsewhere – “if developments identified as being within the withdrawn GMSF are constructed and come into active use, it is expected that there will be an increase in the amount of traffic over and above the existing conditions.” (Page 152</p> <p>In view of this anticipated impact there is a requirement for NH to model such a traffic scenario to show how it will be safely accommodated particularly at the roundabout and with respect to the Scheme’s aims. NH also commented with reference to TMBC’s relevant representation;</p> <p>“The now-abandoned Greater Manchester Spatial Framework (GMSF) proposed 2,790 homes in TMBC, this included the Godley Green development. TMBC has recently submitted a planning application for Godley Green independently of work</p>	<p>The forecast traffic growth used for the assessment of the Scheme has been derived in full accordance with the latest best practice guidance contained in the Department for Transport’s (DfT) Transport Analysis Guidance (TAG) and is based on the DfT’s National Trip End Model (NTEM). NTEM provides forecast growth in trips based on forecast changes in the economy and demographics by area, e.g. forecast changes in population, car ownership, household spending, levels of employment, etc. NTEM therefore inherently accounts for future development since population growth cannot take place without additional housing development and economic growth cannot take place without additional commercial development. Therefore, the traffic forecasts used in the traffic modelling that underpins the assessment of the Scheme inherently accounts for proposed developments in the vicinity of the Scheme, such as the proposed Godley Green development.</p> <p>Planning applications for proposed developments are required to be supported by Transport Assessments that will identify any traffic or transport related adverse impacts that they cause. The developers of these schemes are responsible for proposing and funding highway improvements to accommodate additional development generated traffic and mitigate any identified adverse impacts. It is not National Highways’ responsibility to provide the additional road capacity to enable delivery of individual developments.</p> <p>National Highways’ Spatial Planning team is responsible for assessing the impact of individual proposed developments on the Strategic Road Network (SRN) and agreeing to and securing any required improvements to the SRN necessary to accommodate forecast additional development generated traffic.</p>

Response reference:	Representation Issue	National Highways Response
	<p>on the new Greater Manchester Places for Everyone plan, but at the time of writing (December 2021) the application had yet to be validated. Once validated National Highways will consider whether the application should be included in the “core scenario” of the traffic model.” (Deadline 1 Submission - 9.5 Comments on Relevant Representations.)</p> <p>It should be noted that recently the Authority indeed validated their own Application. I therefore request to know the NH fully updated and reasoned position on this important modelling question?</p>	
9.54.32	<p>(Footnote *) For the purposes of this submission “North Glossopdale” consists of; Glossop north of the A57, Tintwistle, Hadfield (all in High Peak) and also has regard to the Hollingworth border in Tameside.</p> <p>(Footnote **) I will seek to declare my email exchange of the time with my Ward Councillor for Deadline 5, subject obviously to his consent.</p>	

8. Stephen Bagshaw Further comments on the Proposed Development in relation to previous Deadline submissions (REP4-027)

Response reference:	Representation Issue	National Highways Response
9.54.33	<p><u>The Hadfield Alternative</u></p> <p>Having mentioned the 'Hadfield Alternative' (Had-Alt) for the first time, let us explain what is being referred to here and note the fact that NH have never referred to it and have never even published any documents that refer to it.</p> <p>In work done by Balfour, Beatty & Atkins (BBA) a document called 'Routes To Market' has emerged, published to the Inquiry not by NH but by CPRE. In this 249-page tome, two references are made to something which is described as the 'Had-Alt'</p> <p>The first reference on page 56 refers to data collected on Tuesday, Wednesday and Thursday between 7/9/15 & 24/10/15. A couple of points of interest on this. First, the data has been collected on the quietest days of the week. Secondly, the data, which is to be found in Appendix A of the document, appears to have been redacted.</p> <p>The second and final reference is found on page 87 and states:</p> <p>"The enhancements of the model were focused on replicating observed journey times of the key sections of the A57 and A628 in the located study area. As such, an additional journey time validation route has been included, which has been described as the Hadfield Alternative (my emphasis). Figures 8.6 presents the journey time routes used to validate the TPU Stage 3 base model".</p> <p>The Had-Alt is then shown in Fig 8.6 (page 89) as Route 10 of 10 routes. All 10 routes appear to have equal weight, merit and importance attached to them. It appears as a purple line on a scale too small to detect the line of the actual route. Indeed, the actual route is not specified.</p>	<p>The Hadfield Alternative, is not an alternative scheme. It is an existing alternative route, or rat-run, via Dinting Road and Shaw Lane in Glossopdale that traffic currently uses to avoid traffic congestion and delay on the A57 through Glossop. This route is included in the traffic model to ensure that it accurately reflects the network of available alternative routes within Glossopdale and therefore, properly accounts for any rerouting of traffic due to the Scheme.</p> <p>It is standard practice to collect traffic data on 'neutral' or typical days of the week, i.e. Tuesdays, Wednesdays and Thursdays, rather than Mondays and Fridays that are not considered to reflect typical weekday traffic conditions.</p> <p>The traffic modelling used to assess the impacts of the Scheme utilises a strategic reassigned model. This model dynamically reassigns traffic to alternative routes based on the comparative benefit for users of different available routes until model equilibrium is reached. The benefit to users is based on a combination of the quickest and lowest cost route (approximately 70% journey time and 30% user costs for fuel and vehicle maintenance). The assignment of traffic in the traffic model therefore accurately represents the likely routing of traffic in response to changes in the road network due to the Scheme in terms of both layout and junction delay/congestion. Therefore, the traffic model accurately forecasts the changes in traffic flows due to the Scheme, including on the A57 through Glossop and on Dinting Road and Shaw Lane.</p>

Response reference:	Representation Issue	National Highways Response
	<p>So, what exactly is the Had-Alt? Is it a single route as indicated on the map, albeit too small to quantify or analyse? Or is it a more general, amorphous area of multiple minor roads that cut through villages and housing estates?</p> <p>Moreover, why is it called the Had-Alt and what is it an alternative to? If, as one suspects, the A57, then why would you want traffic to rat-run rather than use the A57, other than to avoid triggering the Dinting AQMA?</p> <p>Without there being some sort of statement or clarification as to what the full route of the Had-Alt consists of, how can we ascertain what we are dealing with here? How do we know what is the actual route or routes?</p> <p>Consequently, how do we know if the modelling has covered the entirety of the suggested Had-Alt route? As an example, traffic flows at the eastern end of the model (A57 Link Roads TR010034 – 6.5 Environmental Statement- Appendix 1) shows AADT DM at 5,150 v 5,750 for DS 2025, which suggests it may be part of the Had-Alt, along with Dinting Rd AADT DM 3,100 v 4,500 for DS in 2025.</p> <p>The continuation of the latter route through Hallmeadow Rd, Old Glossop, joining the A57 via Manor Park Rd, is not even indicated on the map, nor is Hadfield Rd, even though it would be an obvious way of reaching Cemetary Rd.</p> <p>Once planned development is complete, urbanising Dinting Rd and making it a thoroughly unattractive route, then Padfield village becomes part of the ‘alternative’ picture, which is also currently beyond the scope of the modelling.</p> <p>By now it has become fairly evident that the diversion plans for the Had-Alt have been somewhat deliberately and rather foolishly kept under wraps by NH, to avoid massive public anger and a backlash against what is already an unpopular Scheme. In fact, they have been reduced to a mere two paragraphs in the Traffic Assessment Report.</p>	

9. Warner Bower Written Summary of oral submissions at hearings and post-hearing written submissions (REP4-028)

Response reference:	Representation Issue	National Highways Response
9.54.34	<p>[Redacted] was purchased by my great grandmother on 25th July 1919 and has been farmed and expanded by subsequent generations, with more substantial expansion occurring over the last 50 years or so. What started off as 62 acres now amounts to 200 acres or thereabouts of which approximately 175 acres is workable. The remainder is occupied by the farm houses and buildings, access tracks, water, stream valleys and banks as well as various woodland, both natural and planted. The farm and business benefits enormously from having all its buildings in a central location within a ring fence, as can be seen on the attached plan which benefit will be lost by the construction of the proposed road as planned. This loss will be felt in terms of inconvenience of access to the severed land, both for moving and managing cattle as well as extra time and increased fuel costs for tractor and machinery access to the severed land. Furthermore, on both sides of the proposed road some fields will be disrupted in such a way as to leave them all but impracticable for the use of modern agricultural machinery.</p>	No response required
9.54.35	<p>This is the third incarnation of a road scheme across our farm in the last twenty years or so. From memory, which may be flawed as to intricate detail, the first scheme allowed for one lane of traffic towards Glossop and two away from Glossop: now, with considerably increased traffic – and more to come given the ongoing and planned development within and around Glossop – a smaller scheme is considered adequate. This defies common sense. The current proposal is also the worst from our perception in that it is closer to the farmhouses and buildings than previous schemes for reasons which have never been adequately explained: this has certainly increased the number of size disrupted fields as referred to in the previous paragraph.</p>	Refer to response RR-859 (REP1-042) regarding severance
9.54.36	<p>Using the figures as calculated by National Highways, during construction we will lose approximately 20% of the workable area of the farm, ie. 33 of 175 acres. When construction is concluded we will have a net loss of approximately 13%, or 23 acres. On the one hand this does not appear to be of considerable consequence but when the 'impracticable' plots are added back this figure approaches some 30 acres. Of course, given that at this late stage detailed design has still to be concluded, these figures may well increase. The applicant may argue that these 'impractical' pieces of ground could be used for grazing and, indeed, they could. However, they will not support any large numbers of stock which will result in greater rotation of stock around different fields, all leading to increased management time and cost. In particular, a severed piece to the north of the new road on land belonging to C Bower & Sons Ltd – the remains of field no 5663 - will</p>	These issues will be passed on to the District Valuer for further consideration as part of the ongoing land negotiations.

Response reference:	Representation Issue	National Highways Response
	<p>only be suitable for grazing: the remaining fields in this severed section are mainly used for mowing so grazing stock will have to be moved more frequently back to the non-severed portion. Given the relative complexity of the new access arrangements to the severed portion, in relation to the systems and tracks currently in place which allow for one man to move groups of cattle in relative ease, this will be a substantially more complex task certainly requiring extra labour at the very least and causing inconvenience to foot and vehicular traffic on Carr House Lane. Some calculations have been made of relative distances from the farmyard to field entrances before and after construction with the after figures in bold:</p> <p>Farmyard to field 5663: 501 m 768 m</p> <p>Farmyard to field 6471: 655 m 824 m</p> <p>Farmyard to field 3976: 316m 523m</p>	
9.54.37	<p>Much of the above may also be applied to plot 5/1e, the small portion remaining of field 0865 to the south of the new road. A new means of access to this piece will also have to be devised somewhere opposite point C. Even more concerning will be our inability to access field 8845 with tractors and machinery during the construction phase because the gates at point C will be within the temporarily occupied area: the only other means of access to this field is for livestock only off a slope which is impracticable for tractors and machinery. With no ability to 'feed' the ground grazing production will be diminished.</p>	<p>A means of access to field 0865 will be provided off Carrhouse Lane during the construction of the Scheme and off the diverted Carrhouse Lane once the Scheme is completed.</p> <p>Discussions will continue with Mr Bower in relation to the issues of access to fields outside of the works area during the construction of the Scheme and efforts will be made to ensure the operation of the farm, including access to field 8845, is accommodated where possible.</p>
9.54.38	<p>The net loss of ground will have an effect on the future of the business in terms of either the number of cattle kept or the amount of 'cash crops' produced on the farm. The virtual complete loss of field no 8867 means that another field currently used for cropping will have to be converted to grazing and the reverse is true of field no 0865. The severed remainder of 0865, to the north of the new road, could be used for grazing but, again, as noted in the paragraph above, for short periods of time only. Another factor to consider will be the provision of drinking water to the severed portions. This is currently bore hole water from our supply pumped to various strategically positioned troughs. To replace the current network of pipes will entail a new pipe from our bore hole, located at A on the enclosed plan, to and through the Carr House Lane underpass and branches off that to the severed portions. It may be more convenient to make a new connection into the water mains at B on the plan, but this negates the benefit of utilising water from our own source which is considerably cheaper than purchased water. Of course, this is a matter which can be agreed with the applicant in due course but is nevertheless worth bringing to the ExA's attention in terms of interference and cost implications.</p>	<p>The details regarding the impacts of the scheme on the current operation of the farm will be passed on to the District Valuer for further consideration as part of the ongoing land negotiations.</p> <p>Further investigations will be carried out into the retention of the existing drinking water supply on completion of the works as part of the ongoing detailed design and will be agreed through ongoing discussions with Mr Bower.</p>

Response reference:	Representation Issue	National Highways Response
9.54.39	<p>Reference was made above to ‘cash crops’ which includes hay and haylage sold locally into the horse leisure market. This accounts for approximately 40% of net income, with livestock sales accounting for a further 40% and sundry income at 10%. An initial estimate suggests income could be reduced by 25% overall. Add to this increased costs in terms of time, fuel and manpower the effect on the bottom line will be significant. A choice would have to be made between reducing cattle numbers or reducing cash crop acreage, given that a proportion of workable land is required to produce enough fodder to feed the herd through a 5-6 month winter. These are decisions which have not yet been made: given the history of proposed and abandoned schemes in this area over the last 60 years or so we have learnt that time may be on our side as to the finite detail. We have to continue to run the business as though the scheme will not come to fruition and make investment decisions accordingly.</p>	<p>These issues will be passed on to the District Valuer for further consideration as part of the ongoing land negotiations.</p>
9.54.40	<p><u>Plots 5/1k, 5/7b, 5/8, 5/7c, 5/6d and unassigned plot between 5/1k and 5/7c</u> Why are these plots required on a temporary basis? We assume that all plots genuinely required on a temporary basis will be leased on a commercial basis.</p>	<p>The plots identified are required for construction of drainage ditches and the realignment of Carrhouse Lane, together with a new access track and public footpath, including associated earthworks and drainage. It is also noted that 5/1k and 5/7c are adjoining plots, there are no unassigned plots.</p>
9.54.41	<p><u>Plot4/13b</u> This plot contains a stream – it is not a river, as referred to by the applicant - which will be diverted due to the construction of an attenuation pond: we understand that this dog leg is necessary because of insufficient fall to culvert the stream more directly under the road. Having studied Section 10 of APP012 this reasoning appears to be flawed. However, given that this new stretch is to be culverted under the footpath diversion it seems reasonable that it could be culverted completely under our retained ground. This would have the double advantage of: wasting less ground and, less future maintenance in terms of bank erosion, de-silting and weed control. There are two deeper culverts under Mottram Moor nearby and another under the former gas works site adjacent to Woolley Lane so local precedent is well established. It is also noted that the stream on the other side of Mottram Moor will be completely culverted.</p>	<p>Any watercourse which has the potential to be affected by proposed works needs to be given due consideration. In accordance with culvert design principles advocated by the Environment Agency² and the Local Lead Flood Authority (LLFA), priority should be given to retaining open channels for purposes including flood defence and environmental benefits. Installation of culverts should only be considered where alternative options have been thoroughly explored and considered infeasible.</p> <p>Whilst Tara Brook is not an ecologically and morphologically diverse river at this location, it is a small headwater stream which still offers valuable aquatic habitat at this scale and is an important contributor to the wider catchment. The open channel design has been adjusted to minimise the extent of land required for the realignment whilst providing sufficient space for the channel to thrive. The watercourse will be designed to be self-sustaining (e.g. two-stage cross-section), such that the maintenance required should be minimal. It should be noted, culverts (especially lengthy ones) will require monitoring and maintenance to reduce risks of blockages, potentially affecting flood risk.</p>

² See CIRIA guidance: [Culvert design and operation guide C689F \(ciria.org\)](https://www.ciria.org/publications/culvert-design-and-operation-guide-c689f)

Response reference:	Representation Issue	National Highways Response
		<p>Securing the realignment of Tara Brook as an open channel is an essential part of the scheme's ecological mitigation, with the aim of enhancing the local watercourse system as a whole, in keeping with the principles of the Water Framework Directive and Biodiversity Net Gain.</p>
9.54.42	<p>In this area we have concerns about the land being lost to the false embankments designed to 'hide' the road. Section 10 shows a bund width of 17.96 metres to the south – given that the carriageway surface here is at existing ground level and, that neither the cattle or sheep in the adjacent fields or the occupants of Mottram Cemetery will be particularly disturbed by the new road, this appears to be unnecessary. A well-designed planting scheme will achieve the same effect at much reduced cost in financial and carbon terms. It is worth pointing out that in field 0865 the bund has been removed in order to facilitate access to field 8845 at point C. Unfortunately, no Section drawing is publicly available for this area. It is also apparent from other Section drawings that a considerable area of land is to be lost in the attempt to hide the road from the horizontal viewpoint, particularly at Section 13 where the bund width will be 6 metres wide and the associated reverse slope some 17.77 metres wide on the south side. Furthermore, has the applicant had regard to the considerable research carried out when the M6 through the Lune Gorge and across Shap, as well as the M62 across the Pennines, were designed? Careful consideration was given to offsetting the effects of snow accumulation through infill and drifting: it is quite clear that the current proposals on this scheme, specifically the use of artificial bunds, do not take these matters into consideration. We can inform the ExA from considerable experience that a section of [redacted text] with similar characteristics very rapidly fills in with snow.</p>	<p>The proposed landscape design is aligned to fit with the existing landscape character.</p> <p>Visually, there are a range of sensitive receptors (e.g. properties and footpaths) that are both long-range and close-range in distance. The mitigation measures have been provided to screen views of the road and moving traffic from all these sensitive receptors.</p> <p>The Scheme would be more visible and prominent in the landscape if the embankments were not present. During the design process the size of the embankments was considered and reduced as far as possible to ensure that land take is as minimal as possible, while still accommodating the optimal heights and slope gradients for them to be effective.</p> <p>With regards to consideration of the impacts of snow accumulation on the Scheme, the proposed cross section includes 1m hard strips and a minimum of 2.5m verges on either side of the single carriageway, in addition, a 3m wide cycleway/footway with equestrian use is provided on the south side of the proposed road where the visual screening bund is also provided. It is therefore considered that there is sufficient width within the proposed cross section to accommodate snow drifts and the clearance of snow from the carriageway.</p>
9.54.43	<p>Section 11 highlights another concern we have regarding the provision of open drainage ditches along both sides of the proposed road. These appear to have been placed an average of 8 metres from the base of the bunds which seems ludicrous if, as we presumed, they were intended to collect surface water from the bunds. Sections 13 and 14 show these ditches on the north side to be higher than the base of the bunds so clearly this is not the case so we must question what these ditches are for? We have previously suggested that these ditches should be replaced with perforated drains, at least 450mm diameter, with the trenches backfilled with gravel. This will save ground and deal with the issue of maintenance, particularly in terms of weed control. It is most unlikely that the applicant will prioritise injurious weed control on the sides of these ditches adjacent to our retained ground, given their apparent unwillingness to do the same on their own ground up and down the country</p>	<p>The primary function of the drainage ditches shown on either side of the proposed link road in sections Channels are to collect surface water runoff from the adjacent land either side of the proposed Scheme. However, consideration will be given to reducing the gap between the ditch and the toe of the embankment as part of the ongoing detailed design process.</p>

Response reference:	Representation Issue	National Highways Response
9.54.44	We will also wish to reserve the right to place field drains into these drainage channels or pipes, both as a result of severance of existing drains and the need to lay new drains in the future.	Where existing field drainage is severed by the construction of the Scheme, these drains will be connected into the proposed highway drainage system in accordance with National Highways standards. Any future requirement for connection of new land drains into the drainage system would need to be discussed with Tameside MBC as the maintained for the proposed highway drainage system and Lead Local Flood Authority (LLFA) for the proposed and existing watercourses,
9.54.45	It is noted that in Sections 13, 14 and 15 the bunds are single slope (except to the south in Section 13) but that the landscaping now encroaches onto the non-disturbed land at the base of the bunds! So, again, ground is being taken unnecessarily. Reference was made to 'a public body seeking to make best use of public resources.' Using public money to buy scarce land unnecessarily is not making the best use of that money, the works proposed on that land are an unnecessary use of energy and are, arguably, an abuse of the compulsory purchase powers and hence our human rights.	The planting will extend beyond bunds in a number of locations in order to tie into the surrounding areas and to better reflect the landscape character and vegetation patterns found in the area. Planting confined to the bunds, will look unnatural, too linear in nature and only draw the eye to the road, defeating the object of screening. This is also good practice in terms of design guidance from the DMRB and the National Highways' 'Road to Good Design' guide
9.54.46	<p><u>Access to [redacted text]</u></p> <p>The provision of access is an ongoing debate, and it is noted that we are being presented with an 'either or' situation regarding the height of the underpass as opposed to the provision of alternative access directly off the new road. This appears to be a cost issue from the applicant's side, whereas we have to ensure that we still have unrestricted access to a full range of commercial vehicles. We feel that at point D it will be necessary to pile adjacent to Carr Brook in order to provide sufficient sweep into and out of the underpass: we acknowledge the design work and computer modelling carried out by the applicant but feel, from experience, that the current design is not meeting our reasonable requirements. We assume that the existing field access track in plots 5/1j and 5/7d will be brought up to standard as part of the construction process. It also clear that the proposed access road across our low-lying land is using a lot of ground and it would be preferable to connect straight in to the existing track at point E.</p>	<p>Discussions are ongoing in relation to the provision of alternative access to the farm buildings. The scheme proposals take account of the operational considerations identified in previous discussions with Mr Bower, this includes the size and type of vehicles which require access. The proposed access provision will be designed to accommodate the movements and swept paths required for these vehicles.</p> <p>The proposed alternative access point for the road across the low-lying land will be considered within the detailed design and will form part of the ongoing discussions with the landowner.</p>
9.54.47	It will be noted that the underpass will also need to be used for the redirection of electricity and telecommunications cables supplying our properties as well as others on [redacted text], along with redirected water supplies as mentioned earlier.	This is noted and the existing utilities serving the properties will be accommodated within the scheme proposals.
9.54.48	We have pointed out to the applicant the need for attenuation of surface water run off from the whole of the 'new' Carr House Lane in the underpass area into Carr Brook, again at point D.	Surface water run-off has been accommodated within the drainage proposals for the diverted Carrhouse Lane, the surface water is collected throughout the length of the diverted access road using a linear drainage system. The flow will be attenuated prior to outfall into the existing watercourse.

Response reference:	Representation Issue	National Highways Response
9.54.49	We have also requested the applicant to investigate the dimensions and condition of the culvert under Carr House Lane at point F. Obviously, with the new attenuation pond adjacent to Mottram Moor and the new drainage ditch to the north of the new road emptying into this stream, the volume of water at times of higher rainfall will be substantially in excess of anything the culvert has had to deal with to date. Clearly any replacement work to this culvert has implications to the access to our property.	Existing flows have been assessed, attenuation provided to ensure flows are not increased as a result of the scheme and is being agreed with the LLFA.
9.54.50	In previous discussions with the applicant we have suggested that a 'yellow box' at the junction of Carr House Lane and Mottram Moor be provided as part of the scheme. The justification for this is simple: the new traffic lights at the Mottram Moor junction will result in two solid lanes of traffic uphill for long periods during the day. Currently it is the inside lane which is solid and with a few courteous, considerate drivers it is possible to exit right in a reasonable manner. Post construction will be a different matter. Furthermore, with the downhill side of Mottram Moor being reduced to one lane vehicles wishing to turn right into Carr House Lane will be sat waiting in the single downhill lane delaying traffic behind. This would problem would be eradicated with the provision of a 'yellow box'.	Additional lanes provided on the approach to the Mottram Moor junction accommodate any predicted queuing at the junction and therefore the introduction of a yellow box would therefore provide little benefit. A Road Safety Audit will be undertaken on completion of the scheme to assess the scheme in operation, if this is found to be a concern at that stage then appropriate action will be taken.
9.54.51	Plot5/6a This is classed as 'land to be used temporarily' but is also proposed as the new access track to our severed land to the east of Carr House Lane and north of the new road. Clearly there is an anomaly here and we have particular concerns as to who will retain the freehold of this access track upon scheme completion. We will not wish to be left in a less secure position than we currently enjoy with regards to access to this block of land. In connection with this the attention of the Exa is drawn to the length of new track which will need to be constructed from this point to reach field 6471 and the remains of field 5662, an estimated length of 250 metres.	The access track is located within the permanent acquisition area and plot 5/6a is required for the construction of this track.
9.54.52	Plots 5/1f, 5/1j, 5/7d, 5/7f, 5/9d : why is it necessary for 'rights to be acquired permanently' on these plots, and what are these rights?	As set out in the table in Appendix A of the Statement of Reasons, the plots are required as follows: Plot 5/1f rights relate to the construction of the proposed Carrhouse Lane underpass at Carrhouse Lane, to accommodate work number 23, below the proposed A57 Link Road and for the diversion of an existing Cadent gas main pipe. Plots 5/1j and 5/7d rights relate to the realignment of Carrhouse Lane, together with a new access track and public footpath, including associated earthworks and drainage. Plot 5/7f rights are to access the location of bat boxes installed on existing trees.

Response reference:	Representation Issue	National Highways Response
		Plot 5/9d rights are to access the location of bat boxes installed on existing trees and the diversion of existing Electricity North West buried power cables
9.54.53	<p>Landscaping</p> <p>Clearly there is a difference of opinion between professionals as to the type of planting required. We would suggest careful examination and replication of the natural growth of mixed species – oak, holly, ash, birch etc - along the small valley of Carr Brook which lies to the immediate south of the proposed road. We do not accept the need for planting of any kind on the land at the base of the false banks as exemplified in Section 13 and Section 14. We would advocate the use of planting in place of the bunds along the side of the road. On the other hand, the M6 through the Lune Gorge appears to blend in well with the landscape without any bunds, false embankments or forced planting/landscaping. So, why is what worked 50 years ago so unacceptable now? Indeed, a careful study of the existing ground level to the south of the new road in Section 10 and 11 suggests that the areas proposed for bunds could be returned to agriculture so a mixed hedgerow against the proposed bridleway would be sufficient here.</p>	<p>Species mixtures have not yet been fixed, this will be finalised at Detailed Design stage. They will reflect locally successful species, including the ones listed, however there are current restrictions on planting oak and ash.</p> <p>The proposed species mixes have been agreed with the local authority in principle, however final species list will be agreed in consultation with them at detailed design stage. Please refer to the Outline Landscape and Ecological Management and Monitoring Plan (REP3-022).</p> <p>The Applicant considers that the proposed planting is reflective of the local character and context.</p>
9.54.54	<p>Save for two relatively short lengths of ‘untrimmed native hedging’, what appears to be missing over the entire length of the scheme is any significant hedgerow planting, which would fit in well with the planting we have done over many years. Surely the applicants’ consultant has noticed the extent of hedgerows in the wider area on our land? Apart from sound ecological reasons hedgerows planted at the same time as the installation of the highway boundary fence will have grown to be stock proof fences by the time the post and rail fencing has begun to rot away. Untrimmed hedging is not in keeping with that which exists and is useless from a stock retention angle. Incidentally, who would be responsible for the maintenance of these considerable lengths of new boundary fence?</p>	<p>The Scheme is proposing 6km of hedgerow overall.</p> <p>Much of the permanent land take boundary that meets the adjacent agricultural land there is currently stockproof fencing proposed. The Applicant would need clarification of where hedgerow would be preferred and this can be through ongoing discussions with the Landowner. Future maintenance of such features would also need to be included in discussion with both the Landowner and Tameside MBC.</p>
9.54.55	<p>We do not accept the ‘moderate adverse’ classification applied to the visual effects of the scheme as viewed from [redacted text] If you stand in the middle of the farmyard the scheme will not be seen, but from many other vantage points it will be very visible and intrusive. As far as the visual impact of the road from a much wider perspective is concerned it would appear to be minimal when compared with the existing roads, volume of housing of all classifications and modern industrial premises within this part of the Longdendale Valley. Certainly, there are a number of industrial buildings between Hadfield and Tintwistle which are very visually intrusive.</p>	<p>The classification is included in the visual impact assessment, which has been undertaken in accordance with DMRB LA 108 Landscape and visual effects, and from publicly accessible land.</p>

Response reference:	Representation Issue	National Highways Response
9.54.56	We have noted that plans have been provided showing lengths of hedging and trees which require removal. We expect that younger trees will be removed in such a way that they can be replanted and not merely discarded.	There are currently no formal translocation proposals included within the Scheme, however the comment is noted.
9.54.57	<p><u>Lighting</u></p> <p>Notwithstanding that this is a semi-urban area is it appropriate for there to be lighting on a speed restricted road which passes through open countryside?</p>	The proposed lighting in this area is required to improve safety and accessibility for the pedestrian. The need for lighting this section of the new link road has been agreed with Tameside MBC is required to improve safety of the pedestrian facility improve safety etc.
9.54.58	<p><u>Severed footpaths</u></p> <p>There are two footpaths to the north of the new road and immediate south of Tara Brook Farm which will need to be extinguished. The reason for this is that they will be severed by the new road and will lead nowhere. It is probable that there will be some vociferous resistance to this by lobbying groups but, from our experience, footpaths which go nowhere inevitably lead to trespass and damage. We fear that there will a substantial amount of incursion onto our retained severed ground in any case simply because it will be severed and under less scrutiny by ourselves</p>	The Applicant is currently discussing with Tameside MBC the most appropriate route for achieving this.
9.54.59	<p><u>Access track to former Hollingworth STW</u></p> <p>We question the need to compulsory purchase the section of track between points G and H on the plan, especially given that the access to the attenuation pond is from the new access track. Again, we have to be certain of not being left in a diminished position regarding control of access to retained ground and note that the current right of access through Tara Brook Farm, which will be extinguished and replaced, is 'unrestricted' in all respects.</p>	The applicant has no intention of changing the existing rights of access to the access track, however additional rights will be required for maintenance of the proposed balancing pond and flood storage area.
9.54.60	Also, in this area we are particularly concerned that the 'issues 'at point H are not interfered with in any way during or after construction. This is the outfall for a number of substantial field drains from our property.	This plot is required for the provision of maintenance access rights for the proposed flood storage area and ecological mitigation, any works in this area will be undertaken in liaison with the landowner and with consideration of the existing infrastructure to ensure it is not interfered with.
9.54.61	It is a fact that this proposed road is a like for like replacement of Woolley Lane and, given the relocation of the traffic lights from the middle of Mottram to the new junction on Mottram Moor combined with the removal of the restraining influence of the traffic lights at the Gun Inn and the Woolley Bridge junction, the new road westbound will become even more congested than Woolley Lane at present. The effects on traffic flow into and through Glossop need no further discussion here. Of the 23 acres that we will lose it would appear that perhaps a third will be under tarmac while much of the rest will be used for 'mitigation' purposes which seems to be a scandalous waste of an ever-decreasing amount of viable agricultural land in this country. When the Victorian entrepreneurs were building railways and other substantial structures with their own funds they did not buy any more land than was	

Response reference:	Representation Issue	National Highways Response
	absolutely necessary to complete the projects needed and yet, today, where public money is concerned, it appears to be 'the more the merrier' as far as land take is concerned. We hope that the ExA will be in the vanguard of turning this policy round.	

10. Keith Buchan obo CPRE PDSY Written Summary of oral submissions at hearings and post-hearing written submissions requested by the Examining Authority (REP4-031)

Response reference:	Representation Issue	National Highways Response
9.54.62	<p>TRAFFIC AND TANSPORT – response to the answers to the ExA’s First Written Questions</p> <p>Question 3.1 What contribution to reducing congestion and reliability does the proposed development make outside the DCO boundary?</p> <p>1. NH has not satisfactorily answered this question. The DCO boundary excludes the whole of Glossop and Hadfield/Padfield. DCC presents compelling evidence that journey times within Glossop would increase with the scheme in place due to congestion (Local Impact Report paras 7.30-7-31; Figure 7-2 & 7-3; Table 7-11). The scheme also causes traffic to use alternative routes and appears to create another major route – the Hadfield Alternative along Dinting Road². In his written representation, Peter Simon has demonstrated the substantial impacts this would have on this residential road.</p>	<p>The traffic modelling used to assess the Scheme covers a much larger area of the road network than just that within the DCO boundary. It therefore captures the impact of the Scheme on traffic congestion and delay in Glossop and Hadfield/Padfield. See National Highways’ responses 3.1 & 3.2 to the Examining first written questions (REP2-021).</p> <p>The Scheme is forecast to result in an increase in traffic flow along Dinting Road and Shaw Lane (Hadfield Alternative) compared to without it. However, the increased in absolute number of vehicles is relatively small. See National Highways’ response RR-0751-1 to the relevant representations (REP1-042).</p>
9.54.63	<p>2. Further afield the impact on Greater Manchester is uncertain as Greater Manchester was excluded from the traffic modelling due to modelling noise⁴. The M60 J24 at the western end of the M67 is already severely congested (further details are in CPRE’s written representation pp99-1005). The scheme would increase this, not reduce it.</p>	<p>Greater Manchester is included in the traffic modelling for the Scheme, but in less detail than that for the road network more directly impacted by the Scheme, which is included in the area of detailed modelling (ADM). See National Highways’ responses 3.1 & 3.2 to the Examining Authority’s First Written Questions (REP2-021).</p>
9.54.64	<p>3. We are not convinced by NH’s arguments that journey times in the wider area are already addressed in the modelling. Instead of concealing complete journey times between Greater Manchester and Sheffield within the modelling, NH should reveal them – this is a reasonable request given that the first objective is to improve connectivity between these two conurbations (this also answers Q3.2).</p>	<p>The changes in journey times for all vehicles across the whole of the modelled road network that pass through the area of detailed modelling (ADM) are captured in the assessment of the Scheme.</p> <p>Of the total travel time benefits delivered by the Scheme, approximately 6% comes from trips between Manchester and Sheffield. A further 10% comes from trips which start or end in Manchester or Sheffield with the other end of the trip in the corridor between them. The bulk of the remaining benefits are for more local journeys in the vicinity of the Scheme. The Scheme is forecast to deliver time savings of approximately 5 minutes per vehicle for journeys between Sheffield and Manchester, depending on exactly where journeys start and end in each city, which is substantial when multiplied by the many millions for journeys that will benefit from these journey time saving per year. The journey time savings also result in wider economic benefits.</p>
9.54.65	<p>Question 3.3 Benefits of the scheme to the SRN and its contribution to RIS2</p> <p>4. In answer to Q3.3a) NH claims the scheme:</p>	<p>The forecast accident rates for different roads across the affected road network change in response to the redistribution of traffic caused by the Scheme and reflecting the safety benefits of the new link road compared to currently used roads. As a result, some roads see a forecast increase in accidents, whilst others see a reduction. Overall, the Scheme is forecast to result in only a marginal 0.3% increase in accidents across the</p>

Response reference:	Representation Issue	National Highways Response
	<ul style="list-style-type: none"> improves safety for all – it does not. It increases traffic on a number of roads which NH itself admits increases the risk of crashes; increases in traffic increase the sense of road danger leading less people to use active travel which in itself reduces the safety risk. NH notes the severity of the crashes on the new road which may increase due to speed. Traffic diverts off the safer M62 onto the A628T increasing the risk of crashes on that route7. The risk of crashes also increases on the M1 according to Figure 7.8 Transport Assessment Report. Fast and reliable journeys – none have been demonstrated as we noted above. Environmentally responsible – NH has attached little import to impacts on the PDNP or to the scheme's increased climate emissions. It has underestimated the impacts on valued distinctive local countryside and people's enjoyment of it; <p>Meeting the needs of all users – those without a car do not benefit; the scheme may incorporate facilities for active travel but the impact of the scheme on physical activity is assessed as neutral by NH. It claims to improve bus service journey times and reliability without having assessed the impacts (see its answer to Q3.14)</p>	<p>road network over 60 years. See National Highways' response 3.25 to the Examining Authority's First Written Questions (REP2-021).</p> <p>The Scheme is forecast to result in significant journey time savings across the affected road network that are reflected in the good Benefit to Cost Ratio (BCR) for the Scheme. The total travel time benefits of the Scheme amount to approximately £166m when the Department for Transport's (DfT) standard value of time is multiplied by the many millions of journeys over the life of the Scheme (60 years) that will benefit from these journey time savings.</p> <p>The environmental impact of the Scheme on the Peak District National Park and climate has been appropriately assessed by National Highways in accordance with best practice guidance.</p> <p>The Scheme incorporates a comprehensive range of improvements for non-motorised users that will encourage local trips to be made by active modes of transport rather than by car. See National Highways' response 19.6 to Derbyshire County Councils Local Impact Report (REP3-018).</p> <p>The traffic modelling enables National Highways to predict that the journey times and service reliability for some bus services will improve with the Scheme because of the reduction in traffic congestion and delay on A57 through Mottram in Longdendale, whilst for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop.</p> <p>Bus services have not been modelled separately because bus services in the area are relatively infrequent and changes to bus journey times are capable of being estimated from the traffic modelling. As bus services are relatively infrequent, bus passenger numbers are very small in comparison to the overall number of vehicles using the affected road network. Consequently, the effects of changes in bus journey times do not materially alter the assessment of the benefits of the Scheme.</p>
9.54.66	<p>5. In answer to Q3.3b) NH states that no other schemes are needed to achieve the benefits of the scheme. This ignores the current environmental degradation of Tintwistle and Hollingworth by traffic congestion and heavy lorries, which will worsen once the traffic jam at Mottram is relieved. It also ignores the environmental damage being inflicted on the PDNP. This would lead to demand for the next piece of road – the Hollingworth-Tintwistle bypass with severe environmental impacts, including on the PDNP.</p>	<p>The benefits of the Scheme, that are based on the traffic modelling, do not rely on any other planned transport infrastructure schemes being brought forward. Both the user benefits and disbenefits across the whole of the affected road network are captured in the Scheme assessment, along with its environmental impacts as presented in the Environmental Statement. See National Highways' response 3.3b to the Examining Authority's First Written Questions (REP2-021).</p>
9.54.67	<p>Question 3.5 study area for transport</p> <p>DCC and TMBC appear satisfied with the study area. As we made clear in both our 6. written representation p22 para 4.2.4 and the report on alternatives, we are not satisfied. The exclusion of Greater Manchester from the area of detailed modelling and the affected route network underestimates the impact of the scheme on the urban area.</p>	<p>See National Highways' response references 9.54.62 and 9.54.63 above.</p>
9.54.68	<p>Question 3.6 data input and modelling; support for other transport modes</p>	<p>It is acknowledged there is a difference in the Department for Transport (DfT) daily count data and the base year modelled flow. The DfT counts themselves are not used as part of the traffic model build in part because</p>

Response reference:	Representation Issue	National Highways Response
	<p>7. Both TMBC and DCC appear satisfied with data input and modelling. We are not. The PDNPA in its Local Impact Report 7.2.1 identified that ‘the figures produced by the National Highways modelling appear at odds with those available on the DfT website’. We too identified (specifically with respect to links on the A628T) that modelled traffic flows were not following the trend of increasing traffic. We have now compared the traffic flows in 2019 with those modelled by NH in 2025 for do minimum without the scheme. As the Table on page 6 below shows the majority of the traffic flows reduce in 2025, except on those roads subject to the modelling refinement which created the Hadfield Alternative9 where there are substantial reductions. As Covid impacts both on transport and the economy were not included in the model, these reduced modelled flows are not understandable. We continue to believe that the model has underestimated the traffic impacts of the scheme.</p>	<p>the "observed" traffic flows as stated by DfT are often extrapolated estimates from previous counts where they were not counted in that specific year. Separately commissioned traffic counts were used to develop the traffic model as part of the model calibration process. These are considered more representative than the DfT counts. It should be noted that modelled traffic flows are based on average hourly flows by time period (AM, PM and interpeak) rather than the daily flow, hence there is scope for greater differences to develop between modelled flows and the DfT count data when factored to a full day.</p>
9.54.69	<p>8. According to its answer to this question TMBC is satisfied that support for other modes has been addressed. DCC refers to the Longdendale Integrated Transport Strategy (Local Impact Report 7.29-7.31 and Figures 7-2 and 7-3). However, as we have shown above in 3.3a) NH has not satisfactorily supported other modes, particularly when looked at in the context of its licence conditions and the promises made in RIS2.</p>	<p>The Scheme incorporates a comprehensive range of improvements for non-motorised users that will encourage local trips to be made by active modes of transport rather than by car.</p>
9.54.70	<p>Question 3.11 High flows on Market Street in Mottram 9. The explanation given by NH to high flows on Market Street does not explain how these flows appear here and magically dissipate.</p>	<p>The forecast increases in traffic flow on Market Street in Mottram due to the Scheme is less in absolute terms due to the overall forecast reduction in traffic flows on the roads that Market Street connects to at either end. This is because the volume of traffic re-routing via the new link road from the roads connecting to Market Street is substantially greater than the forecast increases in traffic volumes on Market Street. Thus, the traffic on Market Street due to the Scheme is less. It does not “magically dissipate” as suggested.</p>
9.54.71	<p>Question 3.12 Alternatives 10. We addressed this question ourselves in our report on Car Free Low Carbon Travel for Longdendale and Glossopdale10. In answering this question the Peak District National Park Authority indicated that it ‘would be supportive of an assessment of the benefits and impacts of introducing weight limits on the A57 Snake Pass and A628(T)’. It is supportive of a weight restriction on the Snake Pass as it is inherently unsuited to HGVs. ‘With regard to the A628(T)... the removal of most HGVs would necessitate the introduction of additional restraint measures, possibly the introduction of a 50mph speed limit.’</p>	<p>No response required</p>
9.54.72	<p>Question 3.19a) Gaps for those crossing the A628T and the Snake Pass</p>	<p>The forecast change in traffic flows on the A628 due to the Scheme is approximately 7%-10% which is insufficient to have a significant adverse effect on severance, i.e. gaps for those crossing the A628.</p>

Response reference:	Representation Issue	National Highways Response
	11. Only the Snake Pass has been addressed – see our response to this below. There is no assessment of crossing the A628T, where the sense of road danger is amplified by the large number of heavy lorries.	
9.54.73	<p>Question 3.20 & 3.21</p> <p>12. No evidence has yet been produced to show that the proposed measures on the detrunked Hyde Road and on Woolley Lane would be effective in preventing through traffic from using the route. In our experience the police do not generally enforce speed limits and require lower speed limits to be self-enforcing. Drivers queuing at the new Brookfield junction would be able to see queues stretching back from the Mottram Moor new junction and would choose Woolley Lane to bypass the queue. A similar effect would apply on the dual carriageway as drivers at the Mottram Moor junction would see the congestion and choose to rat run along Hyde Road.</p>	<p>The traffic modelling undertaken to assess the Scheme has assumed that the speed limit on the de-trunked sections of Hyde Road and Woolley Lane is reduced to 20mph. The intention is that the proposed traffic calming schemes along these sections of road will be designed such that the 20mph speed limit is self-enforcing.</p> <p>The traffic modelling used to assess the impacts of the Scheme utilises a strategic reassigned model. This model dynamically reassigns traffic to alternative routes based on the comparative benefit for users of different available routes until model equilibrium is reached. The benefit to users is based on a combination of the quickest and lowest cost route. The assignment of traffic in the traffic model therefore accurately represents the likely routing of traffic in response to changes in the road network due to the Scheme in terms of both layout and junction delay/congestion.</p>
9.54.74	<p>Question 3.25 Measures to minimise accidents and casualties</p> <p>13. The answers focus on the A75 Snake Pass to which we have responded below. However other routes also experience an increased risk of crashes and these have not been addressed.</p>	See National Highways' response to 9.54.65 above.

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