

A57 Link Roads

TR010034

**9.60 Applicant's responses to Examining
Authority's Second Written Questions**

Rule 8(1)(b)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

March 2022

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

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Regulation Number:	Rule 8(1)(b)
Planning Inspectorate Scheme Reference	TR010034
Application Document Reference	TR010034/EXAM/9.60
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Version	Date	Status of Version
Rev 1.0	March 2022	Deadline 6

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1. Introduction

- 1.1.1. This document sets out National Highways' response to the Examining Authority's second round of Written Questions (WQ2s). Where the written questions requests that National Highways provide new documents, the response specifies which deadline they will be submitted at.

2. The draft Development Consent Order (dDCO) and other consents

No	Question to	Reference	Question	National Highways' response
1. The draft Development Consent Order (dDCO) and other consents				
General matters and other consents				
1.1	Applicant	Other consents	<p>At Issue Specific Hearing 1 [EV-016 EV-018] the Applicant said it would provide an updated Consents and Agreements Position Statement [REP1-009] at Deadlines 5, 7 and 9.</p> <p>An update was not provided at Deadline 5. Please could the Applicant provide updates at Deadlines 6, 7 and 9?</p>	An updated Consents and Agreements Position Statement has been provided at Deadline 6.
Parts 1 to 7				
1.2	Derbyshire County Council	Article 2(1) Interpretation - commence	<p>Derbyshire County Council [REP4-010] raised concerns about the need to secure pre-commencement archaeological investigations and mitigation works, the need for a Written Scheme of Investigation, and for Derbyshire County Council to be consulted accordingly.</p> <p>The Applicant [REP4-006 page 9] has suggested the addition of Requirement 10(8). The ExA understands that the suggestion is that this would provide the necessary mitigation when taken together with Requirement 10(1) and the addition of a definition of "preliminary works" to Requirement 1.</p> <p>(a) Does Derbyshire County Council have any comments on the Applicant's updates to the dDCO [REP5-006]?</p> <p>Does Derbyshire County Council have any remaining concerns regarding the mitigation of pre-commencement activities?</p>	National Highways has no comments to make.
1.3	Applicant Local authorities	Article 7(a) – Limits of deviation	<p>The Applicant [REP4-006 page 12] advised that the Environmental Statement (ES) has not fully considered the horizontal deviation of 5m that would be permitted by the dDCO [REP5-006]. It said that noise and air pollution concentration would be higher than considered in the ES if the roads moved towards receptors and lower if it moved away. The Applicant [REP4-008 Item 2n] said that noise levels could change by between around 1dB and 2dB for receptors closer than 40m to the alignment and considers that there would be unlikely to be any changes to the significance. Changes to air pollution have not been quantified.</p> <p>Noting the potential magnitude of change in noise and air quality arising from a 5m deviation, particularly in the vicinity of sensitive receptors, the ExA is concerned that the Rochdale Envelope does not appear to have included for the proposed limits of deviation and</p>	<p>The use of Limits of Deviation (LoD) in the EIA is a way of dealing with relatively small-scale adjustments in the size and scale of elements of the Scheme. The LoD allow for some flexibility where there are unforeseen circumstances so that effective design solutions can be applied without planning implications, providing there is no material change to the predicted residual environmental effects.</p> <p>As previously advised in the Written submission of Applicant's case at Issue Specific Hearing 1 Item 4 (REP4-006), in the EIA the assessment of the LoD is considered through the use of the Rochdale Envelope, whereby the detailed (usually quantitative) assessment is undertaken based on the design in the Work Plans (REP1-002), and the LoD are considered in a qualitative way. In general, the outputs of the assessment are not considered likely to change materially as a result of the limits of deviation, as they are relatively small-scale margins for change. However, where there are predicted significant effects on a sensitive receptor for any topic (or potential for significant effects due to changes within the LoD) then these parameters are taken into consideration before residual effects are reported.</p>

No	Question to	Reference	Question	National Highways' response
1.	The draft Development Consent Order (dDCO) and other consents			
			<p>that a reasonable worst-case scenario does not appear to have been assessed.</p> <ol style="list-style-type: none"> 1. Please could the Applicant advise on the implications of it being secured that the main carriageway would be permitted to deviate horizontally by up to 1m? How practical would it be for the limit of deviation to vary between 1m and 5m depending on the proximity to sensitive receptors? 2. Please could the local authorities comment on the Applicant's consideration of a horizontal deviation of 5m and on whether that should be reduced to 1m in the vicinity of sensitive receptors? <p>The Applicant [REP4-008] also states that landscape impacts in urban areas could have a change to significance of effects as a result of the limits of deviation. It said that this would be subject to a "not environmentally worse than" assessment.</p> <ol style="list-style-type: none"> 3. Please could the Applicant set out when this assessment would be undertaken and/ or how results would be reported? 	<p>It is not practical to undertake detailed or quantitative assessments for all potential design changes within a horizontal deviation of 5m because, (i) there are too many possible scenarios that would have to be assessed, (ii) horizontal deviations have and will continue to be carefully considered through the detailed design stage so that in aggregate the 'not environmentally worse than' principles can still be applied, and (iii) a 5m horizontal deviation is considered to be relatively small scale along the length of the alignment. Changes in the horizontal alignment are considered through the Evaluation of Change process (please see response to 1.3c below).</p> <ol style="list-style-type: none"> a) The risk of material change doesn't necessarily increase with a larger horizontal deviation, as it is more dependent on the location of the sensitive receptor. For example, the closest sensitive receptors for noise and air quality are in the vicinity of Mottram Underpass and Mottram Moor Junction, and so any alignment change could result in increased effects (positive or negative). However, even small horizontal deviations in these locations would likely result in knock-on changes to the Scheme elsewhere and, due to other key constraints including land take, would mean any significant deviations would need a compelling reason. Conversely, horizontal deviations in more open areas will have a different set of constraints and sensitive receptors, including landscape, ecological and ,water features. The option with the smallest change in residual environmental effect might be the one that requires a larger deviation. It should therefore be understood that all deviations need to consider a solution that has assessed all design, construction, and environmental constraints collectively, and in some instances a permitted deviation of only 1m will unnecessarily rule out the best option. b) No response required. c) The assessment will be undertaken as part of the Evaluation of Change process which is reported in the Evaluation of Change Register. This document will be included in Annex E of the second iteration EMP. This product is produced to provide transparency and support the evaluation of changes in assessment assumptions, project design, or mitigation and monitoring commitments set out in the first iteration EMP and will help to demonstrate consent compliance. Table E-1 in Annex E of the first iteration EMP (REP3-010) shows the outline of the register. The first iteration EMP has been resubmitted at Deadline 6 to include clarity on the Evaluation of Change process. The revised text is in section 1.4.
1.4	Applicant Derbyshire County Council	Article 10 – Street Works	<p>The Applicant [REP4-006] page 13] said that Derbyshire County Council's permit scheme would be disapplied. It referred to ongoing discussions and that a Traffic Management Plan would be consulted on with Derbyshire County Council.</p> <p>Derbyshire County Council [REP4-010] is concerned that there is coordination and liaison to avoid any conflicts and have suggested that 3 months notice be provided of any works.</p>	<p>In discussion with Derbyshire County Council and Tameside Metropolitan Borough Council (meeting on 9 March 2022) National Highways has agreed that the permit schemes will no longer be disapplied in Derbyshire CC or Tameside MBC highway authority areas. The draft Development Consent Order submitted at Deadline 6 has been amended accordingly. National Highways will also give three months' notice of the main start of works to the local highway authorities.</p>

No	Question to	Reference	Question	National Highways' response
1. The draft Development Consent Order (dDCO) and other consents				
			Are the Applicant and Derbyshire County Council able to agree suitable provisions in the first iteration Environmental Management Plan (EMP) [REP3-010 REP5-012] to set out the measures to be included in the Traffic Management Plan?	
1.5	Derbyshire County Council	Article 12(5) - Construction and maintenance of new, altered or diverted streets and other structures – responsibility for maintenance	<p>The Applicant [REP4-006] page 13] said the principles of future maintenance had been agreed with Derbyshire County Council and that the detail would be contained in the second iteration EMP.</p> <p>Derbyshire County Council [EV-016 EV-018 REP4-010] said that responsibilities for maintenance had not been agreed and that any need for commuted sums could be developed through the emerging EMP and the Statements of Common Ground.</p> <p>The ExA notes the potential for measures not being agreed in the Statement of Common Ground, and that the second iteration of the EMP requires consultation rather than agreement with Derbyshire County Council.</p> <p>a) Is Derbyshire County Council content that with Article 12(5)? Should the maintenance responsibilities be set out in the first iteration EMP [REP3-010 REP5-012]?</p>	National Highways has no comments to make.
1.6	Applicant Local authorities	Articles 14(6), 18(11), 19(8), 21(6) – Deemed consent	<p>Please could the Applicant and the local authorities provide an update on discussions regarding the addition of a provision for any application for consent to contain a statement drawing the street authority's attention to the guillotine?</p> <p>If agreement is not reached then the ExA is minded to include this provision, for the reasons set out in the first written questions [PD-009] Q1.19, Q1.21, Q1.22 and Q1.24].</p>	National Highways is agreeable to including this addition.
1.7	Applicant	Article 15(2)(b) - Permanent stopping up and restriction of use of highways, streets and private means of access - Temporary alternative routes for private means of access	<p>The Applicant [REP4-006] page 14] confirmed that private means of access will be maintained.</p> <p>The ExA is considering whether Article 15(2)(b) is sufficiently clear in providing for private means of access to be maintained.</p> <p>Would Article 15(2)(b) be clearer that private means of access would be maintained if the need for alternative routes for streets to be maintained to the reasonable satisfaction of the street authority was set out separately in Article 15(2)(c)?</p>	<p>The Applicant considers that the drafting is clear but has revised the Article as follows:</p> <p><i>(b) a temporary alternative route for the passage of such traffic as could have used the street or private means of access to be stopped up is first provided, to the reasonable satisfaction of the street authority, between the commencement and termination points for the stopping up of the street or private means of access and subsequently maintained, until the completion and opening of the new street, public right of way or private means of access in accordance with sub-paragraph (a) to the reasonable satisfaction of the street authority.</i></p>
Schedules 1 and 2				

No	Question to	Reference	Question	National Highways' response
1. The draft Development Consent Order (dDCO) and other consents				
1.8	Applicant	Further development “... <i>within the Order limits which does not give rise to ...</i> ”	The Applicant [REP4-006 page 16] has added introductory wording to confirm that further development would not give rise to materially new or different environmental effects to those assessed in the ES. For consistency with similar wording elsewhere, should it be amended to “... <i>within the Order limits provided that it does not give rise to...?</i> ”	National Highways has updated the draft DCO accordingly
1.9	Environment Agency	Requirement 4(1) – second iteration EMP	The Environment Agency [REP2-052 Q1.32] said that it wished to be consulted on any EMP detail to ensure mitigation for pollution prevention impacts of the construction are considered for the water environment. The Applicant added a provision for the Environment Agency to be consulted on the second iteration EMP, which includes the Pollution Prevention Plan and the Construction Water Management Plan. Does the Environment Agency have any remaining concerns regarding dDCO [REP5-006] provisions for consultation in relation to mitigation measures for pollution prevention?	National Highways has no comments to make.
1.10	Applicant Local authorities	Requirement 4(1) and (2) - second iteration EMP	The ExA [EV-016 EV-018] has raised concerns that key principles established for the first iteration EMP should not be lost or watered down in subsequent versions. The Applicant [REP4-006 page 17] has explained the process for the development of the second iteration of the EMP and explained that the second iteration would not follow the first iteration “ <i>slavishly</i> ”. The Applicant [REP4-006 page 17] said that the first iteration EMP [REP3-010 REP5-012] incorporates the measures for the construction stage referred to in the ES as being incorporated in the EMP. It said that the second iteration would be updated to reflect the finalised design and construction plans and would reflect the mitigation for the consented scheme. The Applicant does not appear to be comfortable for the dDCO [REP5-006] to require that the measures for the construction stage referred to in the ES are included in the second iteration EMP. The second iteration is the version that would be used during construction. 1. The ExA is considering whether it can rely on the measures for the construction stage referred to in the ES if their inclusion in the second iteration EMP is not secured in the dDCO [REP5-006]. Please could the Applicant comment? Can a firm undertaking be secured regarding the mitigation referred to in the ES?	a) The Examining Authority is correct that the second iteration EMP is the version that will be used during construction. The EMP is a document which is refined and updated at each iteration to provide a clear audit trail outlining the modifications made from any previous iteration and how it remains consistent with the information in the ES. The second iteration EMP is a progression as it is not rewritten for each iteration, as that would not be in accordance with DMRB LA 120, therefore the measures for the construction stage in the first iteration EMP (which are consistent with the ES) will be included in the second iteration EMP but with amendments to refine and update them to reflect the final detailed design. The DMRB definition of ‘ refined ’ means: <ul style="list-style-type: none"> b. as the Scheme is developed and designed, further analysis takes place reflecting the impacts of that design c. refining a product means adding detail as a result of further improved analysis. The DMRB definition of ‘ updated ’ means: <ul style="list-style-type: none"> • The product is updated with up-to-date information but no new analysis. As a live document, the EMP is therefore progressively refined and updated across the lifetime of the product, meaning the measures in the first iteration are required to be included in the second and the third iterations. With reference to the ES, this process is outlined in Section 2.5 of Chapter 2 The Scheme of the ES (REP2-005). The ExA and the Secretary of State can rely on this process because the current wording of the draft DCO requires the later iterations to accord with those that have gone before them. The wording is not new or novel and has been approved the by the Secretary of State on other National Highways DCO schemes (Examples include A19/A184 Testos Junction

No	Question to	Reference	Question	National Highways' response
1.	The draft Development Consent Order (dDCO) and other consents			
			<p>The Applicant [REP4-006 page 17] said that the second iteration EMP would contain a record of the consents, commitments and permissions resulting from liaison with statutory bodies and be kept up to date with any material changes during construction and for consultation to be required on those changes. However, the Applicant does not appear to be comfortable for the dDCO [REP5-006] to include those requirements for the second iteration.</p> <p>2. Please could the local authorities comment?</p>	<p>Improvement and A585 Windy Harbour to Skippool Improvement Scheme). Importantly the Register of Environmental Actions and Commitments (REAC) sets out all of the committed mitigation for the scheme and is incorporated into the first iteration EMP. Naturally the first iteration EMP will need to be developed further once the detailed design has been settled. The second iteration will include all of the construction measures in the first iteration including the construction mitigation in the REAC, subject to any necessary updating or refinement.</p> <p>Requirements 3 and 4 of the draft DCO require the detailed design to be compatible with the preliminary design and for the second iteration EMP to be substantially in accordance with the first. This is not an absence of precision; it is wording which accurately permits the EMP to be refined and updated to reflect the evolution of the detailed design and secure the necessary management and mitigation requirements to ensure the authorised development is appropriately constructed.</p> <p>Requirement 4(2)(a) specifically requires the second EMP to be in accordance with the mitigation measures in the REAC. Again, this is not at absence of precision; it reflects the fact that the mitigation measures relevant to the construction stage from REAC will be inserted into the second iteration EMP at section 3 (see para 3.1.3 of the first iteration EMP). Any remaining matters relating to post construction or the operation of the authorised development will be included in the third iteration EMP (see para 3.1.4 of the first iteration EMP). Requirements 4(3) and 4(6) mandate that the authorised development must be constructed and then operated and maintained in accordance with the EMP approved by the Secretary of State.</p> <p>The ExA and the Secretary of State can therefore be confident that the measures for the construction stage will be incorporated into the second iteration EMP and are already appropriately secured in the dDCO.</p> <p>b) No response required.</p>
1.11	Applicant	Requirement 4(2)(c) - second iteration EMP - Working hours	<p>The ExA [PD-009 Q1.34] is suggesting additional wording to mitigate the impacts of night-time working by giving the local authorities prior notification to help them to manage communications with local communities:</p> <p><i>“Provided that written notification of the extent, timing and duration of each activity is given to relevant local authorities in advance of any works that are to be undertaken outside of the specified hours, except in cases of emergency or for the repair or maintenance of construction equipment, which are to be notified to the relevant local authorities as soon as is practicable.”</i></p> <p>The Applicant [REP4-006 page 18] said that it may not always be possible to give notice for some of the listed works.</p>	<p>The Applicant can agree to the wording sought it being satisfied that notice can be given for the matters noted in points a) to e).</p>

No	Question to	Reference	Question	National Highways' response
1.	The draft Development Consent Order (dDCO) and other consents			
			<p>The ExA would like to understand why some of the works would not be planned in advance. Please could the Applicant explain why it is not possible to give notice for:</p> <ul style="list-style-type: none"> • Night-time closures including for road crossings and final surfacing tie ins? • Any oversized deliveries or deliveries but only where daytime working would be excessively disruptive to normal traffic operation? • Junction tie-in works? • Removal of overhead power lines? <p>Overnight traffic measures?</p>	
1.12	Applicant Local authorities	Requirement 4(4) and 4(5) – third iteration EMP	<p>The ExA [EV-016 EV-018] has raised concerns that key principles established for the first iteration EMP [REP3-010 REP5-012] should not be lost or watered down in subsequent versions. The Applicant [REP4-006 pages 18 to 19] has explained the process and legislative requirements for the development of the third iteration of the EMP and said that the third iteration EMP would be developed from the second iteration EMP, which is the version that would be used for construction. The Applicant does not appear to be comfortable for the dDCO [REP5-006] to require that the measures for the construction stage referred to in the ES are included in the second iteration EMP. The third iteration is the version that would be prepared at handover.</p> <p>a) There are no requirements for approval, or consultation on the third iteration EMP. Please could the local authorities comment?</p> <p>b) Noting that the second iteration EMP is for the construction phase, please could the Applicant advise whether it would reflect measures for the management and operation stage that are included in the first iteration? Is it necessary to ensure that the third iteration reflects measures in the first iteration?</p> <p>c) The ExA is considering whether it can rely on the measures for the management and operation stage referred to in the ES if their inclusion in the third iteration EMP is not secured in the dDCO [REP5-006]. Please could the Applicant comment? Can a firmer undertaking be secured regarding the mitigation referred to in the ES?</p>	<p>a) The Applicant would wish to clarify that the process for producing the third iteration EMP will be included in the second iteration which the local authorities are consulted upon and is approved by the Secretary of State. It is therefore not accurate to suggest that third iteration EMP is not subject to consultation or approval.</p> <p>b) The EMP is required to demonstrate how commitments to environmental management will be delivered throughout the lifecycle of a project. All iterations are therefore required to set out details of the evolution of the EMP, so the first iteration EMP demonstrates that the commitments in the ES can be met, and the second and third iteration EMPs demonstrate in detail how these will be delivered and/or how they have been implemented or achieved. DMRB LA 120 requires the EMP to include all stages so that it sets out actions to manage environmental effects during construction and operation, therefore the second iteration will reflect measures for the management and operation stage that are consistent with those that are included in the first iteration. The second iteration will also detail the process, which will be approved by the Secretary of State in consultation with the relevant authorities, to ensure the measures identified in the first iteration for the management and operation stage are included in the third iteration.</p> <p>c) See the response to 1.10 above, which applies to all iterations of the EMP. Requirement 4(4) mandates that the third iteration EMP must be prepared using the process set out in the approved second iteration EMP. As indicated in a) and b) above, because that process is detailed in the second iteration EMP it will have been subject to consultation with the relevant local authorities and expressly approved by the Secretary of State. It should also be noted that the third iteration EMP is secured through the National Highways' Governance process. A handover of the Scheme from the appointed Principal Contractor to the Operations Directorate or asset owner (which will include the relevant local highway authority responsible for the future maintenance of non-trunk roads) to operate and maintain cannot be completed without the EMP being fully signed off by National Highways, in consultation with the owners of any transferred assets. The appointed Principal Contractor is required to produce a fully DMRB compliant third iteration EMP, including a complete set of Annexes from all iterations. Additionally, the Register of Environmental</p>

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1.	The draft Development Consent Order (dDCO) and other consents			
				<p>Actions and Commitments (REAC) and the final Evaluation of Change Register (EoCR) require dates and signatures by the responsible person against each action, with evidence to support the achievement criteria has been met. It should also include responses to stakeholder consultations. Additionally, Article 12 will also apply where the asset to be transferred is a new or altered highway or street which is to be handed over to the local highway or street authority. That article expressly requires each new or altered highway or street to be completed to the reasonable satisfaction of the relevant local highway or street authority who are to subsequently maintain those facilities.</p>
1.13	Applicant	Requirement 5 – Landscaping	<p>Derbyshire County Council [REP2-051] and [REP4-010] said that the landscape scheme should be approved prior to commencement of the construction works to ensure that works make provision for the approved landscaping. It refers to experience of dealing with large-scale developments where they consider that on too many occasions landscape proposals have had to be significantly amended after the construction phase because the site hasn't been left in an appropriate condition for the required landscaping or on occasions, insufficient land has been left available post construction to accommodate all of the proposed landscaping.</p> <p>Tameside Borough Council [REP5-030] consider it is reasonable for approval of the landscaping to be required to be approved before any construction works commence.</p> <p>a) The Applicant [REP4-006] page 20] proposes that landscaping scheme be submitted and approved before the relevant part of the authorised development can come into use. The Applicant explained that it needs to be able to deliver the highway scheme and has suggested that it's construction may need to guide the landscaping scheme.</p> <p>b) Does the Applicant consider that it is not possible for the construction works to be planned to enable the delivery of a landscape scheme that is submitted and approved? If so, please could detailed justification be provided?</p> <p>The Applicant's approach suggests the potential for a large degree of flexibility in the landscape mitigation that is delivered. Please could the Applicant summarise how the landscaping mitigation is secured and how it is secured that it will not result in no materially new or more adverse effects materially new or materially worse environmental effects in comparison with those reported in the ES? To what extent would the Illustrative Environmental Masterplan [APP-074] Figure 2.4] be followed?</p>	<p>National Highways can agree to the landscaping scheme being approved for each part of the Scheme prior to commencement of the relevant part.</p>

No	Question to	Reference	Question	National Highways' response
1. The draft Development Consent Order (dDCO) and other consents				
1.14	Environment Agency	Requirement 6 – Contaminated land and groundwater	<p>The Environment Agency [REP3-037] made recommendations regarding model procedures and good practice for contamination. The Applicant [REP4-006 page 20] noted the recommendations, the approach taken for the land contamination risk assessment, and referred to the adjustment to Requirement 4(1) to require consultation with the Environment Agency.</p> <p>Does the Environment Agency have any remaining concerns regarding dDCO [REP5-006] provisions in relation to model procedures and good practice for contamination?</p>	National Highways has no comments to make.
1.15	Natural England	Requirement 7 – Protected species	<p>Natural England [REP2-054 Q1.40] suggested additional provisions in relation to the cessation of works in case a protected species is shown to be present or there is a reasonable likelihood of it being present.</p> <p>The Applicant [REP4-006 pages 20 and 21] set out its approach and suggested a provision that relevant works likely to affect the identified protected species must cease until a scheme of protection and mitigation measures has been approved.</p> <p>a) Does Natural England have any comments on the Applicant's suggestion?</p> <p>b) Does Natural England have any remaining concerns regarding dDCO [REP5-006] provisions in relation to protected species?</p>	National Highways has no comments to make.
1.16	Applicant	Requirement 8 - Surface and foul water drainage	<p>Should the end of Requirement 8(1) be amended to: <i>"... following consultation with the relevant lead local flood authority and the Environment Agency on matters related to their functions"</i>?</p>	This change has been made to the dDCO which will be submitted at Deadline 6.
1.17	Environment Agency Lead Local Flood Authorities	Requirement 9(2) – Flood risk assessment	<p>Derbyshire County Council [REP4-010] said that the Lead Local Flood Authority would welcome consultation on any works that were not in accordance with an approved Flood Risk Assessment for clarity and certainty and for the opportunity to comment on or raise concerns about any works that may result in problems for flood risk in the wider area.</p> <p>The Environment Agency [REP3-037] recommended that they should be consulted in relation to works proposed in accordance with the flood risk assessment and otherwise in accordance with the flood risk assessment. They also stated that all works should be carried out in accordance with an approved flood risk assessment regardless of whether affected landowners accept any exceedances of flood levels. They said that the flood risk</p>	National Highways has no comments to make.

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1. The draft Development Consent Order (dDCO) and other consents														
			assessment must show that risks would not be increased elsewhere. The Applicant [REP4-006 pages 21 and 22] responded to the Environment Agency's concerns and updated the dDCO [REP5-006]. a) Does the Environment Agency have any comments on the Applicant's updates to Requirement 9? Do the Environment Agency or the Lead Local Flood Authorities have any remaining concerns regarding dDCO [REP5-006] provisions in relation to flood risk assessment?											
1.18	Applicant	Requirement 10 – Archaeological remains	The ExA [PD-009 Q1.35] suggested that a requirement be added for any programme of archaeological reporting, post excavation and publication to be consulted on and / or agreed in writing. The Applicant [REP4-006 page 22] said that the requirement would be added. Please could the Applicant add a requirement for any programme of archaeological reporting, post excavation and publication to be consulted on and / or agreed in writing?	This has been added to Requirement 10(1).										
1.19	Applicant Local authorities	Requirement 12(1) Details of consultation – minimum period	Please provide an update on discussions regarding the consultation period, for which a period ranging from 14 days to 28 days have been suggested.	National Highways has no comments to make.										
Schedules 3 and 10														
1.20	Tameside Metropolitan Borough Council	Schedule 3, 4 and 5	Has Tameside Metropolitan Borough Council reviewed the latest versions? Does it have any further comments, please?	National Highways has no comments to make.										
1.21	Applicant	Schedule 9 – Protective Provisions	Section 127 of the Planning Act 2008 requires the ExA to consider the potential for serious detriment to Statutory Undertakers for the carrying on of their undertakings. As part of that consideration the ExA seeks written confirmation from the Applicant and from the Statutory Undertakers that all necessary matters, including the protective provisions and any relevant side agreements have been agreed. If written confirmation is not received by all relevant parties before the close of the examination, then the ExA will be minded to recommend to the Secretary of State that it does not make a decision until it has satisfied itself that the protective provisions and any relevant side agreements have been agreed between the Applicant and any Statutory Undertakers that are named in	a) For completeness the name of each Statutory Undertaker for each part of Schedule 9 is set out in the table below: <table border="1"> <thead> <tr> <th>Statutory Undertaker</th> <th>Relevant Schedule 9 Part</th> </tr> </thead> <tbody> <tr> <td>Cadent Gas Limited</td> <td>Part 5</td> </tr> <tr> <td>Cornerstone Telecommunications Infrastructure Limited</td> <td>Part 2</td> </tr> <tr> <td>Electricity North West Limited</td> <td>Part 1</td> </tr> <tr> <td>Environment Agency</td> <td>Part 6</td> </tr> </tbody> </table>	Statutory Undertaker	Relevant Schedule 9 Part	Cadent Gas Limited	Part 5	Cornerstone Telecommunications Infrastructure Limited	Part 2	Electricity North West Limited	Part 1	Environment Agency	Part 6
Statutory Undertaker	Relevant Schedule 9 Part													
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			<p>Schedule 9 and / or have raised relevant matters requiring agreement during the examination.</p> <p>Please could the Applicant provide an update on:</p> <p>a) The name of each Statutory Undertaker that Parts 1, 2 and 3 of Schedule 9 apply to?</p> <p>b) The identification of all relevant side agreements?</p> <p>c) Whether each relevant Part and side agreement has been agreed with each Statutory Undertaker and with the Environment Agency?</p> <p>d) The provision of written evidence from each party of any agreement?</p> <p>Any matters that are still subject to agreement with each party, the steps being taken to resolve them and when any updates will be provided?</p>	<table border="1"> <tr> <td>Lead Local Flood Authority – Tameside Metropolitan Borough Council or Derbyshire County Council</td> <td>Part 3</td> </tr> <tr> <td>National Grid Electricity Transmission plc</td> <td>Part 4</td> </tr> <tr> <td>Openreach Limited</td> <td>Part 2</td> </tr> <tr> <td>United Utilities plc</td> <td>Part 1</td> </tr> </table> <p>b) Please see the table below:</p> <table border="1"> <thead> <tr> <th>Statutory Undertaker</th> <th>Status of Protective Provisions</th> <th>Status of side agreement</th> </tr> </thead> <tbody> <tr> <td>Cadent Gas Limited</td> <td>Agreed (subject to legal agreement being signed)</td> <td>Final form of side agreement with Cadent for approval.</td> </tr> <tr> <td>Cornerstone Telecommunications Infrastructure Limited</td> <td>Approval awaited</td> <td>None</td> </tr> <tr> <td>Electricity North West Limited</td> <td>Agreed</td> <td>None</td> </tr> <tr> <td>Environment Agency</td> <td>Approval awaited following insertion of EA's preferred wording at Part 6</td> <td>None</td> </tr> <tr> <td>National Grid Electricity Transmission plc</td> <td>Previously approved wording included. Approval awaited</td> <td>Side agreement with NGET for approval.</td> </tr> <tr> <td>Openreach Limited</td> <td>Agreed</td> <td>None</td> </tr> <tr> <td>United Utilities plc</td> <td>Wording is in the form approved by</td> <td>None</td> </tr> </tbody> </table>	Lead Local Flood Authority – Tameside Metropolitan Borough Council or Derbyshire County Council	Part 3	National Grid Electricity Transmission plc	Part 4	Openreach Limited	Part 2	United Utilities plc	Part 1	Statutory Undertaker	Status of Protective Provisions	Status of side agreement	Cadent Gas Limited	Agreed (subject to legal agreement being signed)	Final form of side agreement with Cadent for approval.	Cornerstone Telecommunications Infrastructure Limited	Approval awaited	None	Electricity North West Limited	Agreed	None	Environment Agency	Approval awaited following insertion of EA's preferred wording at Part 6	None	National Grid Electricity Transmission plc	Previously approved wording included. Approval awaited	Side agreement with NGET for approval.	Openreach Limited	Agreed	None	United Utilities plc	Wording is in the form approved by	None
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	other sewerage undertakers. Approval awaited						
1.22	Applicant	Schedule 10	a) Should the Register of Environmental Statement Changes be added to Schedule 10 as a document to be certified? b) Please could a copy of the Register of Environmental Statement Changes be submitted to the Examination?	<ul style="list-style-type: none"> The Applicant does not consider that the Register of Environmental Statement Changes should be a separately certified document. The Register is to be provided as a tool to aid the easy identification of the latest version of each chapter of the Environmental Statement. The Environmental Statement is the correct document to be certified and is already listed in Schedule 10. <p>A Register of Environmental Statement Changes will be provided at Deadline 7.</p>			

3. General matters

No	Question to	Reference	Question	National Highways' response
2. General matters				
Legislation and policy				
2.1.	Tameside Metropolitan Borough Council	Draft Places for Everyone: Joint Development Plan Document (DPD) for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan	<p>Since the submission of the application the draft Places for Everyone: Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan has been published for consultation.</p> <p>a) What weight do you consider should be placed on the policies within the document?</p> <p>Please provide justification for why this weight is considered appropriate.</p>	National Highways has no comments to make.

4. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders

No	Question to	Reference	Question	National Highways' response
3.	Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders			
	Traffic modelling			
3.1	Applicant	Level of confidence in traffic modelling / traffic growth assumptions	<p>There is uncertainty at this time resulting from the introduction of electric (or other alternative power trains) for vehicles, possible levels of autonomy for vehicles, the future introduction of policies intended to restrain the use of the private car and encourage transference to more sustainable modes, volatility in fuel prices, changes to working practices and other factors. These have potential to affect forecast traffic growth.</p> <p>a) What level of confidence can now be placed on the traffic modelling? What impact would this have for the case for the scheme?</p>	<p>There are three key elements of any traffic model that determine what level of confidence can be placed on them. These are:</p> <ol style="list-style-type: none"> 1. Future demand forecasting 2. Calibration and validation of the traffic model 3. Parameters used for the assignment of traffic demand across the modelled road network <p>The traffic model used for the assessment of the Scheme has been undertaken using industry standard traffic modelling software that is recognised to accurately assign traffic demand on to the modelled road network based on established and well tested parameters. The model has also been developed calibrated and validated in accordance with best practice and has been checked and reviewed by a National Highways team independent of the A57 Link Road project team. Consequently, a high level of confidence can be attributed to the forecast assignment of traffic demand across the modelled road network.</p> <p>The forecast future traffic demand utilised in the traffic modelling for the Scheme is based on the Department of Transport's (DfT) National Trip End Model (NTEM) that forecasts change in the number of trips between origins and destinations by areas or zones. The NTEM changes in forecast trips are derived from a wide range of demographic and economic forecasts, such as forecast changes in population, economic growth, car ownership levels, etc. that determine the demand for travel, the mode of transport likely to be used for trips and the timing of those trips. This is currently the DfT's established method of forecasting future traffic demand. Therefore, a good level of confidence can be attributed to the demand forecasts utilised in the traffic model. However, as with any forecast there remains varying degrees of uncertainty regarding the demographic and economic forecasts that underpin NTEM. Consequently, a lesser level of confidence would have to be attributed to the traffic demand forecasts utilised in the traffic modelling compared to the forecast assignment of the traffic demand across the modelled road network.</p> <p>Due to the uncertainty in forecasting, DfT's Transport Analysis Guidance (TAG) requires sensitivity tests to be undertaken for high and low traffic growth assumptions when developing the case for a scheme to ensure that all schemes deliver value for money should the central or core traffic growth forecast prove to be inaccurate. These sensitivity tests have been undertaken for the Scheme and have demonstrated that it will deliver user benefits and value for money. Thus, the case for the Scheme remains strong, under both the low and high growth scenarios, with the Benefit to Cost Ratio (BCR) being 19% better for the high growth scenario and a 17% worse for the low growth scenario, compared to the core scenario.</p>

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
3.2	Local highway authorities	Godley Green Development	<p>Reference has been made to a development at Godley Green for which it is understood that an application has now been made and registered. The Applicant has provided a response outlining their approach in dealing with this matter with regard to modelling [REP5-022].</p> <p>a) Are the local highway authorities satisfied with this approach? If not, what approach should be taken to the development in the modelling?</p>	National Highways has no comments to make.
3.3	Applicant	Modal transference.	<p>There are aspirations, both at local and national level, to transfer journeys to more sustainable transport modes.</p> <p>a) Is this reflected within the model? b) If so, what assumptions and allowances have been made to reflect this? If not, should it be?</p>	<p>The traffic modelling used for the assessment of the Scheme is based on the Department of Transport's (DfT) National Trip End Model (NTEM) that forecasts change in the number of trips between origins and destinations by areas or zones. The NTEM changes in forecast trips are derived from a wide range of demographic and economic forecasts, such as forecast changes in population, economic growth, car ownership levels, etc. that determine the demand for travel, the mode of transport likely to be used for trips and the timing of those trips. This is currently the DfT's established method of forecasting future traffic demand. The latest version of NETM does not include a specific generalised allowance for transfer of journeys to more sustainable transport modes. This is because it is a national and local Government policy aspiration that is not currently backed up by firm strategies or comprehensive and coordinated schemes.</p> <p>In addition, bus patronage across most of the UK is in decline and bus services are being withdrawn due to both this and funding cuts.</p> <p>However, the modelling used for the assessment of the Scheme does take account of the anticipated schemes in the 2016 Network Rail Route Specifications, which are:</p>

No	Question to	Reference	Question	National Highways' response
3.	Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders			<p>Phase 1</p> <ul style="list-style-type: none"> • Ordsall Chord : provision of a new line in west Manchester that allows direct routing between Manchester Victoria and Manchester Piccadilly, • Manchester Victoria : redevelopment of Manchester Victoria station to improve the environment of the station and to address the increased passenger numbers projected. This redevelopment will provide a single transport interchange facility between Metrolink, heavy rail and the wider transport network, • Huyton and Roby capacity (Stage 1) : first stage of a two stage project looking at four-tracking options between these stations, and is being delivered as part of the North West Electrification project. Stage 2 is being delivered within Phase 2 of the Northern Hub project. <p>Phase 2</p> <ul style="list-style-type: none"> • Manchester Oxford Road station : remodelling to allow longer and more frequent trains • Manchester Piccadilly station : two additional through platforms 15 and 16 • Manchester Airport : provision of a 4th platform • Manchester Victoria : layout alterations to increase capacity and provide operational flexibility • Core Manchester performance : capacity and performance improvements between Manchester Piccadilly East and Ordsall Lane junction • Chat Moss capacity : headway reductions between Liverpool and Manchester (via Newton-le-Willows)

No	Question to	Reference	Question	National Highways' response
3.	Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders			
				<ul style="list-style-type: none"> • Huyton and Roby capacity (Stage 2) : completion of four tracking between these stations (aligning with Stage 1) Rochdale capacity : provision of a turnback facility • Chinley capacity : provision of turnback and overtaking facilities • Dore and Grindleford capacity : doubling of the single line between Dore West and Dore Station junction and provision of freight recessing facilities • Infrastructure enhancements to improve journey time improvements on the following routes: <ul style="list-style-type: none"> – Earlestown and Chester – Salford Crescent and Euxton Junction (via Bolton) – New Mills and Ashburys (Marple line) – Dore and New Mills South Junction (Hope Valley line) – Manchester and Bradford (Calder Valley line). <p>Other projects include delivery of journey time improvements between Manchester and Liverpool, Hazel Grove and Stockport and Manchester and Leeds. The Manchester Victoria to Stalybridge element of the Manchester to Leeds scheme will be delivered in CP5 as part of the Northern Hub.</p> <p>The Northern Hub interfaces with a number of other key projects in the North West area. In particular, the sponsor team are working closely with the electrification programme teams. It will also interface with the emerging rolling stock strategy to understand the implications of the deployment of EMUs (following the electrification programme in the north).</p> <p>The assessment of the scheme therefore accounts for certain or near certain public transport schemes, as it does for certain or near certain developments and other infrastructure schemes.</p>
3.4	Applicant Local highway authorities	Modal use assumptions. CPRE Peak District and South Yorkshire Branch Deadline 5 Submission - Responses to	<p>There are concerns, expressed by CPRE Peak District and South Yorkshire Branch in [REP5-029 paragraphs 160 and 170] and elsewhere, that public transport and active travel modes have been under-represented in the model.</p> <p>a) Please provide comments on the issues raised.</p> <p>b) If these modes have been under-represented, what effect would this have on the case for the scheme?</p> <p>Do the local highway authorities have any comments in regard to this issue?</p>	<p>a) See response to WQ2 3.3 above. Consequently, the modelling of the Scheme has not under-represented public transport and active travel modes.</p> <p>b) The number of bus passenger, pedestrian and cycle trips across the modelled road network will be very small compared to the number of vehicle driver and passenger trips. Consequently, even if public transport and active travel modes have been under-represented in the model, which is not the case, then it would be unlikely to have a material impact on the assessment of the Scheme or the case for it.</p>

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
		Deadline 4 submissions and comments on Issue Specific Hearing 2 [REP5-029]		
3.5	Applicant Local authorities Peak District National Park Authority Natural England	Screening thresholds	<p>The Design Manual for Roads and Bridges (DMRB) provides screening criteria for traffic flows which are used to decide whether a detailed assessment is required with particular reference to biodiversity, noise, air quality, and in relation to the effects on the Peak District National Park.</p> <p>a) Please provide, for each relevant environmental topic, the screening threshold set out in the DMRB, providing the relevant paragraph reference in each case.</p> <p>b) Please identify any other recognised screening criteria (Institute of Environmental Management and Assessment (IEMA), Institute of Air Quality Management (IAQM), etc) that have been used or considered, providing the relevant paragraph reference in each case.</p> <p>c) Where there is a choice of DMRB or other screening criteria, please identify the criteria selected and the reasoning for that choice.</p> <p>Do the local authorities, Peak District National Park Authority and Natural England have any comments that they wish to make about this matter?</p>	<p>The only topics with traffic flow screening criteria are biodiversity, noise and air quality. The traffic flow screening criteria is applied to the whole of the affected road network which includes the A57 and the A628.</p> <p>Biodiversity:</p> <p>a) Threshold: The study area for assessment of the impacts of nitrogen deposition on ecologically designated sites is defined as the area within 200 m of the roads meeting the traffic scoping criteria within DMRB LA 105 (paragraph 2.1). The following traffic scoping criteria are applied based on the comparison between 'with Scheme' (Do Something (DS)) and 'without Scheme' (Do Minimum (DM)) traffic data as defined in DMRB LA 105:</p> <ol style="list-style-type: none"> Road alignment will change by 5 m or more; or Daily traffic flows (two way) will change by 1,000 annual average daily traffic (AADT) or more; or Heavy Duty Vehicle (HDV) flows (two way) will change by 200 AADT or more; or A change in speed band (for one and two way traffic and in any time period (morning peak, interpeak, evening peak, off peak)). <p>b) Other recognised screening criteria: Natural England provide traffic screening criteria for the assessment of the impact of road schemes on European Sites (Special Area of Conservation (SAC), a Special Protection Area (SPA) or a Ramsar site) as part of the Habitat Regulation Assessment (HRA) within the guidance document "Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (2018)". The screening threshold for AADT within the guidance is the same as that within DMRB LA 105 (a change greater than 1000 AADT).</p> <p>c) Selected criteria: The guidance in the DMRB LA105 has been used in the air quality assessment reported in ES Chapter 5 (REP3-006) as this represents current best practice for National Highways Scheme assessments. The traffic screening threshold for the total AADT change in traffic flow requiring air quality assessment as set out within "Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (2018)" is the same as that within DMRB LA 105.</p>

No	Question to	Reference	Question	National Highways' response
3.	Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders			
				<p>Air quality</p> <ul style="list-style-type: none"> a) Threshold: The air quality study area is defined as the area within 200 m of the roads meeting the traffic scoping criteria within DMRB LA 105 (paragraph 2.1). The following traffic screening criteria are applied based on the comparison between 'with Scheme' (Do Something (DS)) and 'without Scheme' (Do Minimum (DM)) traffic data as defined in DMRB LA 105: <ul style="list-style-type: none"> a. Road alignment will change by 5 m or more; or b. Daily traffic flows (two way) will change by 1,000 annual average daily traffic (AADT) or more; or c. Heavy Duty Vehicle (HDV) flows (two way) will change by 200 AADT or more; or d. A change in speed band (for one and two way traffic and in any time period (morning peak, interpeak, evening peak, off peak)). b) Other recognised screening criteria: No other UK guidance provides screening/scoping criteria for National Highways schemes. c) Selected criteria: The guidance in the DMRB LA 105 has been used in the air quality assessment reported in ES Chapter 5 (REP3-006) as this represents current best practice for National Highways Scheme assessments. The traffic screening thresholds for changes in traffic flow requiring air quality assessment as set out within the Institute of Air Quality Management (IAQM) Land-Use Planning and Development Control: Planning for Air Quality (2017) are specifically intended for residential and mixed used developments rather than highways projects. See National Highways response to Item 7dd in Written submission of Applicant's case at Issue Specific Hearing 1 (REP4-006) and Second Written Question 7.5 in National Highways response to the Second Written Questions submitted at Deadline 6. <p>Noise</p> <ul style="list-style-type: none"> a) Threshold: The DMRB LA 111 asks the scoping questions to determine the need to undertake a further noise assessment (paragraphs 3.41 and 3.42). If the answer to any of these questions is 'yes', a further assessment would be undertaken: <ul style="list-style-type: none"> a. <i>"Is the project likely to cause a change in Basic Noise Level or 1dB LA10,18h in the Do Minimum Opening Year (DMOY) compared to the Do Something Opening Year (DSOY)?"</i> b. <i>Is the project likely to cause a change in Basic Noise Level of 3dB LA10,18h in the Do Something Future Year (DSFY) compared to the DMOY?"</i> c. <i>Does the project involve the construction of new road links within 600m of noise sensitive receptors?"</i> d. <i>Would there be a reasonable stakeholder expectation that an assessment would be undertaken?"</i>

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
				<p>b) Other recognised screening criteria: Alternative guidance is stated below</p> <ul style="list-style-type: none"> a. Transport Analysis Guidance (TAG) Unit A3 "Environmental Impact Assessment", dated 2021. This document provides information on scoping but ultimately refers to the DMRB for guidance on scoping for road-based schemes b. A number of other guidance documents provide information on issues to consider in noise assessments but do not define screening/scoping criteria. These documents include IEMA "Guidelines for Environmental Noise Impact Assessment" dated 2014 and some of the guidance referred to in Table 11.1 of Chapter 11: Noise and Vibration (REP3-007). c) Selected criteria: The DMRB LA 111 standard has been used in Chapter 11: Noise and Vibration (REP3-007) as this represents current best practice for road traffic noise assessments and is the only guidance that provides screening/scoping criteria for road schemes.
3.6	Applicant	Trips diverting within the Local Study Area	<p>Various routes have been identified onto which trips may divert to avoid delays and minimise journey times or costs as perceived by drivers. These trips pass through Tintwistle, Hollingsworth and Glossop, as well as other settlements, and may have adverse impact on relevant environmental topics.</p> <p>Please confirm whether, or not, the worst-case scenario for diverted trips, with maximum estimated flow, has been considered when assessing the impact of such diversions.</p>	<p>The traffic modelling used for the assessment of the Scheme provides the best indication of how future traffic demand will use the road network in response to changes in the operation of the modelled road network due to the Scheme compared to without it, whilst accounting for forecast traffic growth and other committed future modifications to the road network.</p> <p>For the routing of traffic across the modelled road network to significantly alter from that forecast by the traffic modelling, physical measures or schemes would need to be introduced onto the road network, such as changes in speed limits, traffic calming measures, additional traffic signals, etc., that would cause drivers to choose alternative competing routes. Any such proposed modifications to the road network would be outside of the Scheme and subject to an impact assessment prior to their implementation that would need to consider the diversionary impact of the physical measures or schemes on traffic and the consequential environmental effects.</p> <p>Consequently, the forecast traffic flows across the modelled road network are considered to represent a reasonable and appropriate worst-case scenario of the traffic impacts of the Scheme.</p>
3.7	Peak District National Park Authority	Confidence limits for traffic flows on links within the National Park. National Highways Deadline 3 Submission - Comments on	<p>Please confirm whether, or not, the Authority is satisfied with the Applicant's explanation regarding confidence in traffic increase figures / screening out of effects on the A628 [REP3-028].</p>	<p>National Highways has no comments to make.</p>

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
		Local Impact Report submitted by Peak District National Park Authority [REP3-028]		
Alternatives				
3.8	Applicant	Gyratory Stephen Bagshaw's Written Representation submitted at Deadline 2 [REP2-088]	In his written representation Mr Bagshaw has proposed an alternative scheme to the proposal. a) Has this alternative been considered previously? b) If so, what were your conclusions? c) Please provide a response to the issues raised. Do you consider that the proposal provides an alternative solution which would satisfy the same aims of the scheme, provide the same, or improved, benefits and is deliverable?	<p>Alternatives to the proposed Scheme that have previously been considered and rejected are presented in Chapter 3 of the Environmental Statement (REP2-005). The Mottram Gyratory Flow alternative presented in Mr Bagshaw's submission was not one of the alternative options considered by National Highways.</p> <p>The alternative options considered by National Highways were developed based on potential solutions that were likely to best meet the scheme objectives and feedback from stakeholder and public consultation, including on historically proposed solutions. The scheme previously proposed and presented in Mr Bagshaw submission was not one of the potential alternative solutions identified through this process.</p> <p>Large one-way gyratories, such as that proposed by Mr Bagshaw, are not considered appropriate solutions to traffic congestion and are frequently being retrospectively removed from the road network for the following reasons:</p> <ul style="list-style-type: none"> i) The one-way sections can lead to high traffic speeds with poor adherence to speed limits. ii) Unless contra-flow bus lanes are provided, bus services are disadvantaged, as well as bus passengers due to bus stops being in different locations for the start and end of return journeys. iii) Cyclists are also disadvantaged unless separate segregated facilities for cyclists are provided that by-pass the one-way system. iv) Local access can become convoluted due to the one-way system.
3.9	Applicant	Measures to promote carbon-free / low carbon travel CPRE Peak District and South Yorkshire Branch Written Representation at Deadline 4 [REP4-016]	In their written submission, including, amongst others, [REP4-016] CPRE Peak District and South Yorkshire Branch propose an alternative scheme to the proposal for car-free low carbon travel for Longdendale and Glossop. a) Has this alternative, or any of the various constituent measures, been considered previously? b) If so, what were your conclusions? c) Please provide a response to the issues raised.	<p>a) Alternatives to the proposed Scheme that have previously been considered and rejected are presented in Chapter 3 of the Environmental Statement (REP2-005). Sustainable transport measures were considered as one of the alternative options and rejected.</p> <p>b) The reasoning for rejection was that this alternative did not address the identified problems or the route objectives. Moreover, although considered feasible with challenge, current congestion and capacity issues experienced on the route results in a significant challenge in terms of delivering sustainable transport improvements, particularly for improvements relating to bus services. It was also decided introduction of larger scale interventions would enable the provision of complementary public transport measures.</p>

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
			Do you consider that the proposal provides an alternative solution which would satisfy the same aims of the scheme, provide the same, or improved, benefits and is deliverable?	c) See National Highways' comment 2.1.12 on CPRE Peak District and South Yorkshire Written Representations (REP4-009).
Traffic effects outside the Order Limits				
3.10	Applicant Derbyshire County Council	Junction of A57 Brookfield / Shaw Lane / Dinting Vale North Derbyshire County Council Deadline 2 Submission - Local Impact Report from Derbyshire County Council [REP2-045]	In their Local Impact Report [REP2-045], Derbyshire County Council identify concerns regarding future capacity at the junction of A57 Brookfield / Shaw Lane / Dinting Vale North and that this will result in local delays. a) Has any specific analysis of the operation of this junction been undertaken? b) Should the specific mitigation be provided to address any resultant additional? c) Has any potential mitigation been considered? d) If so, how would this be secured? e) Would an increase in junction capacity at this junction affect any driver-perceived attractiveness of the Shaw Lane / Dinting Road route for drivers? f) If so, what would be the resulting effect? g) Would any additional diversion of traffic require additional mitigation?	a) An accurate representation of the operational parameters for the junction of A57 Brookfield / Shaw Lane / Dinting Vale North is included in strategic traffic modelling used to assess the impacts of the Scheme. However, this junction has not been subject to separate detailed stand-alone junction traffic modelling. b) The traffic signal timings at the junction have been optimised in the Do-something scenario to mitigate the impact of the Scheme without the introduction of any physical changes to the junction layout. As previously stated in National Highways' response 7.26 to Comments on Local Impact Report submitted by Derbyshire County Council (REP3-018), National Highways view is that this junction should be considered for operational improvements by Derbyshire County Council, irrespective of the A57 Link Roads Scheme. To this end National Highways will liaise with Derbyshire County Council to investigate viable alternative solutions, if the Scheme were to be granted DCO consent, to develop an acceptable solution. National Highways do not consider that any further mitigation at this junction is required to realise the benefits of the Scheme. c) See response to b) above. d) How such mitigation would be secured is not relevant as National Highways do not consider that any further mitigation at this junction is required to realise the benefits of the Scheme, beyond optimisation of the traffic signal timings. e) An increase in the capacity at this junction would probably have an impact on the assignment of traffic across the modelled road network, including potentially on Dinting Road and Shaw Lane. Revised traffic modelling would need to be undertaken to determine the likely redistribution of traffic if capacity at this junction was to be increased through any proposed physical changes to the junction layout. f) See response to e) above. g) The diversionary traffic effects of changes in the capacity at this junction would need to be assessed based on the outputs of revised traffic modelling to understand whether any additional mitigation would be required.
3.11	Peak District National Park Authority	Traffic management measures on A57 Snake Pass	There are concerns that traffic flow over the Snake Pass will be increased by route transference and will result in additional accidents. Derbyshire County Council have identified a possible solution to control vehicle speeds on this route to address this issue. This would involve the introduction of average speed cameras.	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
			<p>a) Do you consider such a solution would provide a practicable and effective solution to vehicle speed management on the A57 Snake Pass?</p> <p>b) If not, why not?</p> <p>Do you have any suggestions for acceptable physical measures on the A57 Snake Pass to address highway safety?</p>	
3.12	Peak District National Park Authority	Traffic management measures on A628 Woodhead Pass.	<p>Similarly there are concerns that traffic flow over the Woodhead Pass will be increased by route transference and result in additional accidents. Derbyshire County Council have identified a possible solution to control vehicle speeds on this route to address this issue. This would involve the introduction of average speed cameras.</p> <p>a) Do you consider such a solution would provide a practicable and effective solution to vehicle speed management on the A628 Woodhead Pass?</p> <p>b) If not, why not?</p> <p>Do you have any suggestions for acceptable physical measures on the A628 Woodhead Pass to address highway safety?</p>	National Highways has no comments to make.
3.13	Peak District National Park Authority High Peak Borough Council Derbyshire County Council	Car parking within the National Park.	<p>Improving road access to the National Park may encourage people to access the National Park by private motor car. During site inspections, it was observed that much of the parking along the A57 Snake Pass took the form of informal roadside parking, particularly around locations where Public Rights of Way (PRoW) cross or join the road.</p> <p>a) What effects would increased parking demand have on: -</p> <ul style="list-style-type: none"> • Highway safety, and • Visual amenity? <p>b) Should formal provision be made to manage these effects?</p> <p>c) If not, why not?</p> <p>d) If so, how could such provision be secured?</p> <p>e) Could increased demand for travel for visitors be addressed in other ways?</p> <p>If so, how would this be delivered?</p>	National Highways has no comments to make.
3.14	Applicant	Traffic passing through Bamford and the Peak District National Park	<p>Concerns have been raised regarding increases to traffic flows through Bamford and the National Park [REP2-060 and REP5-027].</p> <p>a) Please respond to the issues raised, including: -</p>	<p>a) The traffic modelling undertaken to assess the Scheme indicates that the traffic flow on the A6013 through Bamford is forecast to reduce by approximately 1% in 2025 and increase by approximately 1% in 2040, compared to without the Scheme. Consequently, the impact of the Scheme on traffic flows through Bamford is forecast to be effectively neutral.</p>

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
		Representation received at Deadline 2 [REP2-060] Representation received at Deadline 5 [REP5-027]	<ul style="list-style-type: none"> Changes to link flows; and Highway safety. b) Should any mitigation measures be provided to address the issues raised? If so, how would these be secured?	<p>A6013 provides a link between the A6187 and the A57 that runs in a north-south direction and therefore, the Scheme is not forecast to result in traffic re-routing along the A6013 through Bamford, as there will be no journey time benefits in using it for east-west journeys across the Pennines that the Scheme provides for.</p> <p>The forecast changes in traffic flows on the A6013 through Bamford due to the Scheme of less than 1% are insufficient to have any material impact on severance or road safety along this road. The Scheme improves journey times for traffic travelling between Sheffield and Manchester across the PDNP. In doing so the Scheme is forecast to increase the amount of traffic using both the A57 and A628 through the PDNP due to some rerouting of traffic from alternative competing routes. However, the Scheme does not improve access to the PDNP such that it would materially alter the numbers of visitors to the PDNP travelling by car.</p> <p>b) The changes in traffic flows on the A6013 through Bamford due to the Scheme are forecast to be broadly neutral and consequently, no mitigation measures need to be provided.</p>
Connectivity within the Order Limits				
3.15	Applicant	Access on Carrhouse Lane [REP4-028]	<p>In their response at Deadline 4, JJ and WE Bower [REP4-028], raised concerns regarding the alignment of the approach to, and the internal height clearance of, the proposed underpass at Carrhouse Lane.</p> <p>Please summarise the approach taken to the design of the underpass, including the parameters of vehicles which it is designed to accommodate.</p>	<p>The underpass at Carrhouse Lane is designed with a minimum headroom of 5.3m which is the minimum standard overbridge headroom provision for new construction accordance with DMRB CD 127. This headroom provision would therefore accommodate all standard vehicles which use the trunk road network including HGVs.</p> <p>Discussions are ongoing between the National Highways and Mr Bower to investigate the potential for reducing the headroom at this structure on the basis that alternative HGV access will be available from the proposed single carriageway link road to the east of the property.</p>
3.16	Applicant	Access on Carrhouse Lane [REP4-028]	<p>In their response at Deadline 4, JJ and WE Bower [REP4-028], raised concerns that vehicles turning right into Carrhouse Lane may experience difficulties, and engender delays on the network. It has been suggested that a yellow box junction to safeguard access may be appropriate.</p> <p>a) Has the Applicant considered such provision? b) What benefits and / or disbenefits does the Applicant consider would result from such provision?</p> <p>If considered to be of benefit how would such provision be secured?</p>	<p>As stated in National Highways comments on the Deadline 4 submissions (pg. 28, reference 9.54.50, REP5-022) additional lanes provided on the approach to the Mottram Moor junction are designed to accommodate any predicted queuing on the approaches to the junction which are not forecast to extend back to the junction with Carrhouse Lane. Therefore, the introduction of a yellow box on Mottram Moor at the location of the junction with Carrhouse Lane would provide little benefit as the queues are not predicted to extend to this point.</p> <p>However, 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, such action may include the introduction of yellow box markings or similar measures to prevent the restriction of access to and from Carrhouse Lane as a result of queuing traffic.</p>

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3.17	Applicant	Bus journey times	<p>It is likely that buses will remain on routes using the existing road network, rather than using the links provided by the proposal. The information provided on bus travel times within the application is limited.</p> <p>Please provide, preferably in diagrammatic form, a breakdown of link journey times for local bus routes, showing, for each link, predicted journey times for the Do-Minimum and Do-Something scenarios, in opening and design years for journeys within the Local Study Area.</p>	<p>The tables below present the anticipated whole route changes in bus journey times due to the Scheme for the AM, Inter and PM peak periods for both 2025 and 2040. The changes in journey times presented are only those for when the bus is travelling on roads included in the traffic model. They excludes bus dwell times at bus stops and journey times where the buses are travelling along streets in residential areas not included in the traffic model, which are not anticipated to change due to the Scheme.</p> <p>Plans showing these changes in bus journey times by route sections (links) are provided in Appendix A.</p> <table border="1"> <thead> <tr> <th colspan="2">Bus Route Journey Times from Model</th> <th colspan="4">(Units: hh:mm)</th> </tr> <tr> <th colspan="6">2025</th> </tr> <tr> <th>Bus</th> <th>Description</th> <th>Period</th> <th>DM</th> <th>DS</th> <th>Change</th> </tr> </thead> <tbody> <tr><td>237</td><td>Ashton - Glossop</td><td>AM</td><td>00:35</td><td>00:36</td><td>00:01</td></tr> <tr><td>237</td><td>Ashton - Glossop</td><td>IP</td><td>00:35</td><td>00:38</td><td>00:03</td></tr> <tr><td>237</td><td>Ashton - Glossop</td><td>PM</td><td>00:36</td><td>00:38</td><td>00:02</td></tr> <tr><td>237</td><td>Glossop - Ashton</td><td>AM</td><td>00:34</td><td>00:35</td><td>00:01</td></tr> <tr><td>237</td><td>Glossop - Ashton</td><td>IP</td><td>00:34</td><td>00:37</td><td>00:03</td></tr> <tr><td>237</td><td>Glossop - Ashton</td><td>PM</td><td>00:34</td><td>00:38</td><td>00:04</td></tr> <tr><td>387</td><td>Ashton - Hyde</td><td>AM</td><td>00:28</td><td>00:25</td><td>-00:03</td></tr> <tr><td>387</td><td>Ashton - Hyde</td><td>IP</td><td>00:30</td><td>00:25</td><td>-00:05</td></tr> <tr><td>387</td><td>Ashton - Hyde</td><td>PM</td><td>00:31</td><td>00:27</td><td>-00:04</td></tr> <tr><td>387</td><td>Hyde - Ashton</td><td>AM</td><td>00:27</td><td>00:25</td><td>-00:02</td></tr> <tr><td>387</td><td>Hyde - Ashton</td><td>IP</td><td>00:29</td><td>00:27</td><td>-00:02</td></tr> <tr><td>387</td><td>Hyde - Ashton</td><td>PM</td><td>00:30</td><td>00:28</td><td>-00:02</td></tr> <tr><td>341</td><td>Hyde - Mottram - Glossop</td><td>AM</td><td>00:27</td><td>00:26</td><td>-00:01</td></tr> <tr><td>341</td><td>Hyde - Mottram - Glossop</td><td>IP</td><td>00:30</td><td>00:26</td><td>-00:04</td></tr> <tr><td>341</td><td>Hyde - Mottram - Glossop</td><td>PM</td><td>00:32</td><td>00:28</td><td>-00:04</td></tr> <tr><td>341</td><td>Glossop - Mottram - Hyde</td><td>AM</td><td>00:28</td><td>00:28</td><td>00:00</td></tr> <tr><td>341</td><td>Glossop - Mottram - Hyde</td><td>IP</td><td>00:27</td><td>00:27</td><td>00:00</td></tr> <tr><td>341</td><td>Glossop - Mottram - Hyde</td><td>PM</td><td>00:28</td><td>00:28</td><td>00:00</td></tr> <tr><td>393</td><td>Glossop - Hadfield - Glossop</td><td>AM</td><td>01:00</td><td>01:00</td><td>00:00</td></tr> <tr><td>393</td><td>Glossop - Hadfield - Glossop</td><td>IP</td><td>00:59</td><td>01:00</td><td>00:01</td></tr> <tr><td>393</td><td>Glossop - Hadfield - Glossop</td><td>PM</td><td>01:00</td><td>01:00</td><td>00:00</td></tr> </tbody> </table>	Bus Route Journey Times from Model		(Units: hh:mm)				2025						Bus	Description	Period	DM	DS	Change	237	Ashton - Glossop	AM	00:35	00:36	00:01	237	Ashton - Glossop	IP	00:35	00:38	00:03	237	Ashton - Glossop	PM	00:36	00:38	00:02	237	Glossop - Ashton	AM	00:34	00:35	00:01	237	Glossop - Ashton	IP	00:34	00:37	00:03	237	Glossop - Ashton	PM	00:34	00:38	00:04	387	Ashton - Hyde	AM	00:28	00:25	-00:03	387	Ashton - Hyde	IP	00:30	00:25	-00:05	387	Ashton - Hyde	PM	00:31	00:27	-00:04	387	Hyde - Ashton	AM	00:27	00:25	-00:02	387	Hyde - Ashton	IP	00:29	00:27	-00:02	387	Hyde - Ashton	PM	00:30	00:28	-00:02	341	Hyde - Mottram - Glossop	AM	00:27	00:26	-00:01	341	Hyde - Mottram - Glossop	IP	00:30	00:26	-00:04	341	Hyde - Mottram - Glossop	PM	00:32	00:28	-00:04	341	Glossop - Mottram - Hyde	AM	00:28	00:28	00:00	341	Glossop - Mottram - Hyde	IP	00:27	00:27	00:00	341	Glossop - Mottram - Hyde	PM	00:28	00:28	00:00	393	Glossop - Hadfield - Glossop	AM	01:00	01:00	00:00	393	Glossop - Hadfield - Glossop	IP	00:59	01:00	00:01	393	Glossop - Hadfield - Glossop	PM	01:00	01:00	00:00
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3.18	Local authorities and local highway authorities	Modal Transference	<p>There are aspirations, both at local and national level, to transfer journeys to more sustainable transport modes.</p> <p>a) Do you consider that sufficient consideration been given during the assessment of the effects of the scheme to Public Transport networks?</p> <p>Is the design flexible enough to provide for any future increase in public transport usage and associated infrastructure?</p>	National Highways has no comments to make.																																																																																																																																										
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3.19	Applicant	Tameside Metropolitan Borough Council Response to the Examining	In their response to the Examining Authority's First Written Questions [REP2-056] Tameside Metropolitan Borough Council identify an aspiration for a minimum overhead clearance of 2.5 metres on the public pedestrian route that passes under the western end of the River Etherow Bridge.	As stated in the Applicant's response to REP2-056 item 3.18, a minimum of 2.5 meters will be accommodated in the detailed design of the pedestrian route which passes under the western end of the River Etherow Bridge.																																																																																																																																										

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		Authority's First Written Questions [REP2-056]	a) Could this be provided? If not, why not?	
3.20	Applicant	Scheme Layout Plans [REP5-004] Sheet 4 of 10	On the A57(T) north-eastern (Mottram Moor) arm, the layout indicates a single north-eastbound traffic lane running alongside a new length of footway, or footway cycleway. This, however, appears to terminate, decanting footway users onto carriageway. Further, there is no connectivity indicated between the proposed footway or footway / cycleway and the existing footway serving 123-133 Mottram Moor. a) Would the Applicant clarify what is intended in terms of footway or footway / cycleway provision connection to the footway of Mottram Moor to the north-east? Please provide updated plans showing the intended layout, with all footway connections.	The footway/cycleway on both sides of the proposed link to the A57 connects into the existing footway with an additional connection towards the housing on the north of the A57. The cycleway connects into proposed segregated cycleways on both sides of the A57 (T). Updated plans will be provided at deadline 8.
3.21	Applicant	Tameside Metropolitan Borough Council Deadline 5 Submission - Post-hearing submission requested by the Examining Authority - Comments on Issue Specific Hearing 2 Items [REP5-031]	Tameside Metropolitan Borough Council identified benefits for active travel and connectivity resultant from the provision of direct linkage of the routes provided alongside the dual carriageway to Roe Cross Lane. Further benefits would accrue by the provision of connectivity through the proposed public open space on the roof of the underpass. a) Would the Applicant comment on the feasibility and benefits and / or disbenefits of such provision? If such connectivity were to be provided, how would it be secured?	Discussions are ongoing between the Applicant and Tameside MBC to develop a proposal for a link between the proposed bridleway and Edge Lane. This link will be delivered by Tameside MBC separately with support from the Applicant. Connectivity for cyclists and pedestrians will be incorporated into the design of the area over the underpass.
Public Rights of Way				
3.22	Applicant	Stub ends of existing PRow	There is concern that, following construction, some PRow will be left with residual lengths that no longer connect to the wider network and that leaving residual lengths may lead to problems of trespass and damage. Particular concern has been raised regarding footpaths in the vicinity of Tara Brook Farm. a) Would it be beneficial to stop cul-de-sac lengths up at the same time as they are severed?	The Applicant agrees that it would be beneficial to stop cul-de-sac lengths of footpaths up in the vicinity of Tara Brook Farm. Discussions are ongoing with the owners of the land on which the footpaths in question are located and those landowners also support the stopping up proposals for these lengths. National Highways will work with Tameside Metropolitan Borough Council to ensure that this is achieved using appropriate legislation outwith the DCO.

No	Question to	Reference	Question	National Highways' response
3. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders				
			If so, how would such stopping-up be secured?	
Design – transport networks, traffic, walkers, cyclists, and horse riders				
3.23	Applicant Local authorities Local highway authorities	First Written Questions [PD-009 Q3.23]	Please provide an update regarding discussions seeking to secure future maintenance of the relevant works.	National Highways has no comments to make.
Remaining concerns				
3.24	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?	National Highways has no comments to make.
3.25	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?	National Highways has no comments to make.
3.26	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?	National Highways has no comments to make.
3.27	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?	National Highways has no comments to make.

5. Peak District National Park

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			
4.1	Applicant	ES Chapter 7: Landscape and Visual Effects [REP2-007]	The Applicant [REP4-008 Item 4o] refers to Paragraphs 7.3.45 and 7.5.9 [REP2-007] not being agreed with Peak District National Park Authority. Is Paragraph 7.3.45 complete?	Paragraph 7.3.45 of Chapter 7 Landscape and Visual Effects is missing the words 'in the PDNP' to conclude the sentence. This will be amended.
4.2	Applicant Natural England	Regard to the statutory purposes of Peak District National Park Section 62 of the Environment Act 1195	Peak District National Park Authority [REP4-012] said that the assessment methodology does not allow for an adequate judgement to be made regarding potential effects of the Proposed Development on the statutory purposes of the Peak District National Park - to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks'.) as defined by the Environment Act 1995. Do the Applicant and Natural England consider that sufficient regard has been given to the statutory purposes of Peak District National Park, consistent with s62 of the Environment Act 1995? Please provide reasoning.	<p>Sufficient regard has been given to the statutory purposes of Peak District National Park, consistent with s62 of the Environment Act 1995 as explained below and in the further in the responses that follow to other questions.</p> <p>It is important to note that Land is designated as a National Park to achieve the statutory purposes set out in section 5(1) of the National Parks and Access to the Countryside Act 1949 i.e. for the purpose—</p> <ul style="list-style-type: none"> a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; <u>and</u> b) <u>of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.</u> <p>Section 5(2) of the 1949 Act (as amended) provides: “The said areas are those extensive tracts of country in England. . . as to which it appears to Natural England that by reason of—</p> <ul style="list-style-type: none"> (a) their natural beauty, and (b) the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population, <p>it is especially desirable that the necessary measures shall be taken for the purposes mentioned in the last foregoing subsection.”</p> <p>It follows that National Parks are not areas of land to be preserved in aspic. They are not areas of land which people are to be encouraged not to visit so that that they may be preserved. On the contrary they are designated to be conserved and enhanced but also to promote the enjoyment of these areas by the public, particularly because they afford opportunities for open-air recreation and where they are position close to centres of population. They are there to be visited and enjoyed.</p> <p>This gives rise to a tension between the purposes which Parliament has recognised through section 62 of the Environment Act 1995 which added a new section 11A. Section 11A of the 1949 Act seeks to resolve that tension and provides that:</p> <ul style="list-style-type: none"> (1) A National Park authority, in pursuing in relation to the National Park the purposes specified in subsection (1) of section five of this Act, shall seek to foster the

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			<p>economic and social well-being of local communities within the National Park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.</p> <p>(2) In exercising or performing any functions in relation to, or so as to affect, land in a National Park, any relevant authority shall have regard to the purposes specified in subsection (1) of section five of this Act and, if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.</p> <p>A "relevant authority" is defined to include any public body and so embraces National Highways and an Examining Authority.</p> <p>In Stubbs (on behalf of Green Lanes Environmental Action Movement) v Lake District National Park Authority [2020] EWHC 2293 (Admin). The Court discussed the issues relating to the potential for conflict between the limbs of section 5 and the implications of Section 11A(2) of the 1949 Act:</p> <p>The approach which a decision maker must take is to seek to address any conflict between the limbs of section 5 through management initiatives. Where a decision maker determines that the conflict between the two limbs can no longer be satisfactorily mediated through management or stewardship then, in circumstances where it is judged that both purposes cannot be accommodated and the decision maker concludes that it must make a choice, section 11A(2) makes clear that it is the first of the purposes which is to be afforded greater weight.</p> <p>However this position is not reached unless the conflict is "acute, or unresolvable, or irreconcilable".</p> <p>This means that the first stage of assessing the impact of a scheme upon a national park is to ascertain:</p> <ul style="list-style-type: none"> a) The extent to which it would adversely affect the conservation of the natural beauty, wildlife and cultural heritage of the park; and b) The extent to which it would promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public. <p>An increase in potential visitation within a national park is not per se contrary to these objectives. It is only if the impact of the increase in visitation upon natural beauty, wildlife</p>

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			
				<p>and cultural heritage cannot be managed satisfactorily to the extent that the natural beauty, wildlife and or cultural heritage cannot be conserved to a degree which is acute, unresolvable or irreconcilable that section 11(2A) falls to be applied. Where section 11(2A) does fall to be applied, then a decision which prevents increased visitation and conserves natural beauty, wildlife and or cultural heritage would have to be taken. But to arrive at this point a decision maker would have to be satisfied that there is no means by which management could not reduce the adverse impact of additional visitation to acceptable levels.</p>
4.3	Applicant	National Policy Statement for National Networks (NPSNN) Paragraphs 5.150, 5.152 and 5.154	<p>Please could the Applicant signpost the consideration given to NPSNN Paragraphs 5.150, 5.152 and 5.154 in its application and summarise its reasoning and conclusions regarding:</p> <ul style="list-style-type: none"> a) The “<i>great weight</i>” to be given to conserving landscape, scenic beauty? How is the “<i>great weight</i>” considered in the assessment of indirect effects and their significance? b) The need to plan the Strategic Road Network to encourage routes that avoid National Parks? c) The duty to have regard to the purposes of Peak District National Park, with the aim of avoiding compromising the purposes of designation and the need for the Proposed Development to be designed sensitively given the various siting, operational, and other relevant constraints. 	<p>Paragraph 5.150 and 5.152 fall within a section of the NPSNN under a heading “Development proposed within nationally designated areas”. As a result, those paragraphs fall to be construed within the context of that heading when considering the circumstances in which they apply.</p> <p>Paragraph 5.150 of NPSNN states: “Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions.”</p> <p>That paragraph applies when considering the impact of schemes which proposed development to be undertaken within a national park. Since the Scheme does not propose this, paragraph 5.150 does not apply.</p> <p>Paragraph 5.152 of NPSNN states: “There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.”</p> <p>Within the context of the headed section of the NPSNN in which it appears, paragraph 5.152 adopts of policy of discouraging road building within a national park. New routes that avoid National Parks are to be preferred. The Scheme achieves this objective since it</p>

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			<p>is not located within the National Park and does not involve development being undertaken within the National Park. Accordingly, this paragraph of NPSNN does not have any application to indirect effects of a Scheme which takes place outside of a National Park.</p> <p>The next section of the NPSNN is headed “Developments outside nationally designated areas which might affect them”. This means that paragraphs 5.154-5 are the paragraphs that are specifically relevant to the Scheme since, although the development would take place outside of a national park, it is recognised that its indirect effects have the potential to affect the national park.</p> <p>“5.154 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on designated areas in Wales or on National Scenic Areas in Scotland.</p> <p>5.155 The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.”</p> <p>As set out in Chapter 3 Assessment of alternatives of the ES (REP2-005), the Scheme has been designed sensitively to consider siting, operational and other constraints.</p> <p>a) Notwithstanding that the PDNP lies distant from the Scheme (approximately 2km), the assessment of indirect effects has allocated the landscape and visual receptors related to the PDNP the highest level of sensitivity as set out in ES Chapter 7 Table 7.21 and 7.24. The Special Qualities of the PDNP have been considered.</p> <p>b) Paragraph 5.152 of NN NPS refers to planning the SRN to encourage routes that avoid the National Parks. As stated above the Scheme achieves this objective since it is not located within the National Park and does not involve development being undertaken within the National Park. The wording does not prohibit new routes (or traffic impacts) in the National Park altogether in all circumstances. An option to restrict HGVs from using routes through the Peak District National Park was considered by National Highways but rejected as undeliverable. Please refer to National Highways’ responses RR-0170-1 (REP1-042) and 2.1.5 (REP4-009). Chapter 3 Assessment of alternatives of the ES (REP2-005) provides a description of all the reasonable alternatives that were studied by the Applicant, and presents the main reasons for the chosen option, including how route</p>

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			
				<p>selection took into account the impacts on the PDNP. c) The assessment takes full regard of the purposes of the PDNP and assesses that the indirect effects for landscape are slight adverse for Moorland Slopes and Cloughs LTC and the Open Moors LTC, and neutral for the Enclosed Gritstone Upland Upper Valley Pasture (as set out in the ES Chapter 7, Table 7.29). The significance of effect of viewpoints within the PDNP are assessed as neutral (as set out in ES Chapter 7, Table 7.32). The landscape and visual assessment of indirect effects relates to traffic change on selected routes and agreed viewpoints. The Scheme route selection and design of individual elements (which are not visible from the PDNP) are considered for the study area but not applicable to the PDNP.</p>
4.4	Applicant	National Planning Policy Framework (NPPF) Paragraphs 176 and 185	<p>Please could the Applicant signpost the consideration given to NPPF Paragraphs 176 and 185 in its application and summarise its reasoning and conclusions regarding:</p> <ul style="list-style-type: none"> a) The “<i>great weight</i>” to be given to conserving and enhancing landscape, scenic beauty, wildlife, and cultural heritage in National Parks? How is the “<i>great weight</i>” considered in the assessment of indirect effects and their significance? What enhancement measures have been identified and how are they secured by the dDCO or other means? b) How the Proposed Development has been sensitively located to avoid or minimise adverse impacts on the National Park? c) How the Proposed Development has been designed to avoid or minimise adverse impacts on the National Park? d) The need to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation? What consideration has been given to the indirect effects from increases in traffic and the potential for increases in car parking? 	<p>To be clear the NPPF can only be a material consideration in the determination of DCO applications which have their own policy documents which are to be applied. As the NPPF explains at paragraph 5:</p> <p>“The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.”</p> <p>Section 104(3) of the Planning Act 2008 states that the Secretary of State must decide the application in accordance with any relevant National Policy Statement except to the extent that one or more of subsections (4) to (8) applies.</p> <p>If the adoption of a new version of the NPPF resulted in a change of policy which was relevant to a particular type of NSIP, then there are procedures within the 2008 Act to enable the Government to update any relevant National Policy Statement. Where this is not done, it cannot be assumed that the NPS is out of date since it may have been concluded that a change/update is not appropriate in respect of that type of NSIP or for that NPS. Moreover as noted above the Secretary of State is constrained in its decision making by section 104(3) As a result, there is real danger in simply applying the NPPF as if it contains policy that is determinative of applications for NSIPs. It does not and to apply it as if it did could result in an error of law.</p>

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			<p>It follows that the approach set out in paragraph 176-177 and 183 of the NPPF is not one which is intended to apply to the Scheme. The national policy which is applicable is that contained in the NPSNN and the NPSNN, as set out in the response to Q4.3 above, contains its own policies in relation to the impacts of schemes upon national parks. Any differences of approach as between the NPPF and the NPSNN must be deliberate given the different objectives of the NPPF and the NPSNN.</p> <p>Notwithstanding the above the Applicant responds to the particular paragraphs of the NPPF.</p> <p>Paragraph 176 concerns the application of great weight to conserving and enhancing landscape and scenic beauty. Paragraph 185 relates to the likely effects of pollution on health, living conditions and the natural environment, as well as potential wider impacts resulting from noise (on health, quality of life, and tranquil areas) and impacts of light pollution on local amenity, dark landscapes and nature conservation.</p> <p>a) Notwithstanding that the PDNP boundary lies distant from the Scheme (approximately 2km), the assessment of indirect effects has allocated the landscape and visual receptors related to the PDNP the highest level of sensitivity as set out in ES Chapter 7 Table 7.21 and 7.24. Sensitivity is one of the components that informs significance of indirect effects as set out in Table 7.14 and 7.19 within Chapter 7. Sensitivity is informed by value and susceptibility with the PDNP receptors being considered of high value. Enhancement within the PDNP through mitigation is not possible as it lies outwith the Order limits nor is it required given the significance levels.</p> <p>Heritage assets within the National Park were given the appropriate special consideration during the assessment process. Noise and visual intrusion from the presence of the road and movement of traffic forms part of the existing setting of heritage assets along the A57 within the National Park. At baseline an almost constant flow of traffic was noted on the A57 within the National Park.</p> <p>While increases in traffic along the route would result from the operation of the Proposed Scheme, this would not materially alter the quality of views to or from surrounding heritage assets, or intervisibility between them. Short-term changes in noise would be limited to the immediate environs of the road corridor and no long-term perceptible change in noise is predicted. Based on these considerations, it was concluded that increases in traffic as a result of the Proposed Scheme would not result in any appreciable impact to setting that would affect the significance of heritage assets in the National Park. The lack of impacts on cultural heritage assets within the National Park led us to scope them out of the Historic Environment assessment.</p>

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			
				<p>Although the National Park contains cultural heritage assets, we do not consider the National Park as a cultural heritage asset in its own right so it has not been assessed as such in its totality.</p> <p>b) Please refer to the response to WQ2 4.3b</p> <p>c) Please refer to the response to WQ2 4.3b</p> <p>d) On the matter of artificial light: there is no new street lighting proposed within the PDNP. The additional headlights from increased traffic flow would not be readily perceptible in relation to the magnitude of change. Ambient lighting from the Scheme would not be perceptible given the distance is in excess of 2km from the Scheme and the existing baseline (i.e. the Scheme lies in a well lit area) and night-time traffic flow is low through the PDNP. On the matter of Dark Skies, the potential impact on Dark Skies within the PDNP has been considered. There are three areas designated by the Peak District National Park as 'dark skies sites'. However, they are all outside of the study area and due to the distance (the nearest part of the Scheme to the nearest dark skies site is approximately 28km ranging to approximately 40km) the Scheme is unlikely to be visible from any of the 'dark skies' sites'. Therefore, we have given this issue adequate consideration within the assessment.</p> <p>On the matter of increased traffic, please refer to item 4.7 below and associated Table. The hourly traffic is anticipated to increase, however the existing situation is that tranquillity is currently impacted by the current levels of traffic on the A57 and A628 within the PDNP (i.e. the baseline is not considered to be tranquil in the immediate vicinity of these routes at the viewpoint locations), therefore it is the magnitude of this change that has been assessed. The ES has concluded that the changes in traffic will not result in any significant changes in light along these routes.</p> <p>Existing parking is limited on the A57 and A628 through the PDNP, and there are no proposals to increase this.</p>
4.5	Peak District National Park Authority	Effects in the vicinity of routes through the National Park	Does Peak District National Park Authority have any concerns about indirect effects in the vicinity of routes through the Peak District National Park apart from the A57 Snake Pass? Please provide reasoning.	National Highways has no comments to make.
4.6	Natural England Derbyshire County Council	Slight effects and material considerations	Peak District National Park Authority [REP2-048, REP2-055] considers that slight effects could be material to the decision-making process. The Applicant [REP4-008] Item 4o] said that is not in alignment with DMRB LA104 Table 3.7, which is the methodology for the assessment.	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways response																																																								
4. Peak District National Park																																																												
	High Peak Borough Council		Please could Natural England, Derbyshire County Council and High Peak Borough Council comment? Has enough consideration been given to all relevant guidance, policy, and legislation, apart from the DMRB?																																																									
4.7	Applicant Natural England Derbyshire County Council High Peak Borough Council	Effects	<p>Peak District National Park Authority [REP4-012] said that the effects arising from an increase in traffic should not be described as “no change”. It questioned the consideration given to the impact on tranquillity and on the perceptions of tranquillity from increases in traffic.</p> <p>The Applicant [REP4-008 Item 4t] has described the process by which the indirect effects of traffic were assessed, which involved the assessor applying the % change difference in traffic data and numbers to the receptor experience on site.</p> <p>a) Given the “great weight” and protection afforded by the NPSNN and NPPF, would it be proportionate for the assessment to provide more quantification for the assessment, including hourly increases in traffic, increases in noise and any potential increases in car parking? Please provide reasoning.</p> <p>b) Please could the Applicant quantify hourly increases in traffic, increases in noise and any potential increases in car parking? Could that quantification then be used to update the assessment in terms of the perception of changes in noise, landscape and visual impact, tranquillity, dark skies, and other relevant considerations?</p> <p>Peak District National Park Authority [REP4-012] has raised concerns regarding the consideration of tranquillity, including in relation to light from windscreens/ bodywork, litter, exhaust fumes and noise channelling through valley?</p> <p>c) Please could the Applicant and Natural England comment?</p>	<p>b) The forecast hourly traffic flows in 2025 on the A57 and A628 through the Peak District National Park (PDNP) in 2025 for the Do-minimum and Do-something scenarios is presented in the table below.</p> <table border="1"> <thead> <tr> <th>Road</th> <th>Scenario</th> <th>AM peak hour</th> <th>Inter-peak hour</th> <th>PM peak hour</th> </tr> </thead> <tbody> <tr> <td rowspan="4">A57 Snake Road/Pass</td> <td>2025 Do-minimum</td> <td>205</td> <td>251</td> <td>245</td> </tr> <tr> <td>2025 Do-something</td> <td>247</td> <td>383</td> <td>298</td> </tr> <tr> <td>2025 Difference</td> <td>42</td> <td>132</td> <td>53</td> </tr> <tr> <td>2025 % Difference</td> <td>20.5%</td> <td>52.6%</td> <td>21.6%</td> </tr> <tr> <td rowspan="4">A628 Tintwistle to B6105</td> <td>2025 Do-minimum</td> <td>1,112</td> <td>1,082</td> <td>945</td> </tr> <tr> <td>2025 Do-something</td> <td>1,165</td> <td>1,189</td> <td>1,019</td> </tr> <tr> <td>2025 Difference</td> <td>53</td> <td>107</td> <td>74</td> </tr> <tr> <td>2025 % Difference</td> <td>4.8%</td> <td>9.9%</td> <td>7.8%</td> </tr> <tr> <td rowspan="4">A628 A6024 to A616</td> <td>2025 Do-minimum</td> <td>1,285</td> <td>1,194</td> <td>1,127</td> </tr> <tr> <td>2025 Do-something</td> <td>1,319</td> <td>1,298</td> <td>1,189</td> </tr> <tr> <td>2025 Difference</td> <td>34</td> <td>104</td> <td>62</td> </tr> <tr> <td>2025 % Difference</td> <td>2.6%</td> <td>8.7%</td> <td>5.5%</td> </tr> </tbody> </table> <p>The Scheme improves journey times for traffic travelling between Sheffield and Manchester across the PDNP. In doing so the Scheme is forecast to increase the amount of traffic using both the A57 and A628 through the PDNP due to some rerouting of traffic from alternative competing routes. However, these increases in traffic flow are not anticipated to result in any corresponding growth in the demand for car parking within the PDNP. This is because the Scheme does not improve access to the PDNP such that it would materially alter the numbers of visitors to the PDNP travelling by car.</p>	Road	Scenario	AM peak hour	Inter-peak hour	PM peak hour	A57 Snake Road/Pass	2025 Do-minimum	205	251	245	2025 Do-something	247	383	298	2025 Difference	42	132	53	2025 % Difference	20.5%	52.6%	21.6%	A628 Tintwistle to B6105	2025 Do-minimum	1,112	1,082	945	2025 Do-something	1,165	1,189	1,019	2025 Difference	53	107	74	2025 % Difference	4.8%	9.9%	7.8%	A628 A6024 to A616	2025 Do-minimum	1,285	1,194	1,127	2025 Do-something	1,319	1,298	1,189	2025 Difference	34	104	62	2025 % Difference	2.6%	8.7%	5.5%
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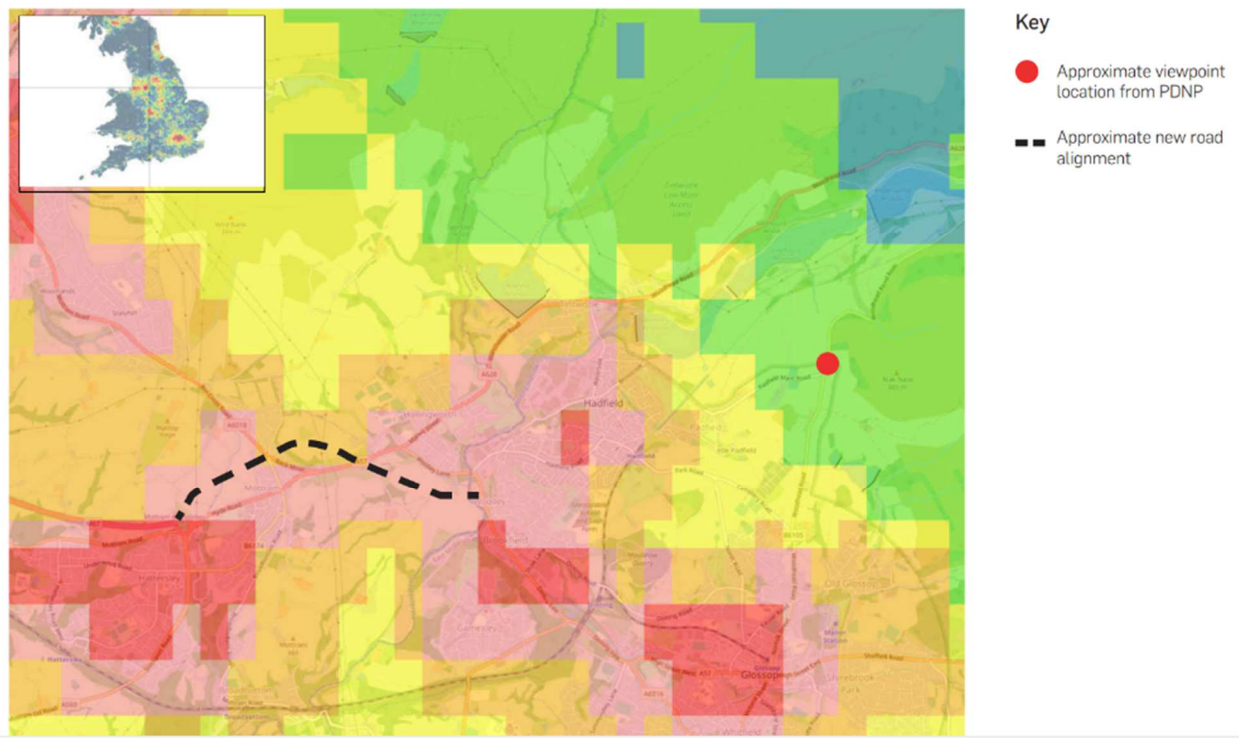
No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			
				<p>c) Existing parking is limited on the A57 and A628 through the PDNP, and there are no proposals to increase this. A minor noise increase from traffic at Snake Pass was predicted in the opening year, which would be perceptible to footpath users on their approach to the A57. A negligible impact would occur in the future year, so noise increases would not be perceptible in the long term. No significant effects would occur to footpath users. The assessment has not considered noise from parking, however the acoustic character of the area would be similar, so if there is increased occupancy of the current parking provision then it is predicted that negligible impacts would occur.</p> <p>As shown in the data in the response to 4.7b) above, the hourly traffic is anticipated to increase, however the existing situation is that tranquillity is currently impacted by the current levels of traffic on the A57 and A628 within the PDNP (i.e. the baseline is not considered to be tranquil), therefore it is the magnitude of this change that has been assessed. The ES has concluded that the changes in traffic will not result in any significant changes in noise or air quality along these routes. The magnitude of change is judged not to be perceptible to a degree that would result in other factors that affect tranquillity (such as light from windscreens/ bodywork, litter) to be greater than a negligible adverse change. Please refer to the Applicant's response to Item 4 t) in the Written summary of Applicant's case at ISH2 (REP4-008).</p>
4.8	Applicant Peak District National Park Authority	Any other comments on submissions for Deadline 4	<p>a) Does the Applicant have any other comments on the Peak District National Park Authority's responses under the heading of "Peak District National Park (PDNP)" in its Deadline 4 submission [REP4-012]?</p> <p>b) Does the Peak District National Park Authority have any other comments on the Applicant's responses under Items 4p and 4t in its Deadline 4 submission [REP4-008]?</p>	National Highways has no comments to make.
4.9	Peak District National Park Authority Applicant	Study area, baseline conditions, overall methodology, and mitigation Statements of Common Ground	<p>Peak District National Park Authority [REP2-048, REP2-055 and REP4-012] is questioning the Applicant's assessment in relation to the consideration of Peak District National Park.</p> <p>a) Please could the Peak District National Park Authority comment on the implications of their concerns for the matters noted as "Agreed" in their draft Statement of Common Ground with the Applicant [REP2-024]?</p> <p>b) Please could the Applicant and Peak District National Park Authority ensure that matters that are either agreed or not agreed are set out in the final signed copy of their Statement of Common Ground and submit this before the end of the Examination?</p>	b) A final version of the Statement of Comment Ground will be issued by Deadline 9.

No	Question to	Reference	Question	National Highways response
4. Peak District National Park				
4.10	Natural England Applicant	Study area, baseline conditions, overall methodology, and mitigation Statements of Common Ground Deference to advice provided by Peak District National Park Authority	<p>Natural England [REP4-025 Item 4] have deferred to advice provided by the Peak District National Park Authority in relation to matters raised by the ExA in Issue Specific Hearing 2 [EV-015 Item 4r]. Natural England have been invited to respond to related matters in these second written questions. The ExA notes that Natural England is the government's statutory advisor in relation to areas which are subject to national landscape designations, such as Peak District National Park.</p> <p>a) Please could Natural England comment on the implications of Peak District National Park Authority's concerns for the matters noted as "Agreed" in their draft Statement of Common Ground with the Applicant [REP2-028]?</p> <p>b) Please could the Applicant and Natural England ensure that matters that are either agreed or not agreed are set out in the final signed copy of their Statement Ground and submit this before the end of the Examination?</p> <p>c) For the avoidance of doubt, please could Natural England clarify that when it defers to Peak District National Park Authority, should the ExA interpret that as Natural England agreeing with Peak District National Park Authority?</p> <p>d) Please could Natural England clearly set out when it defers to any responses provided by Peak District National Park Authority in its responses to these second written questions?</p>	b) A final version of the Statement of Common Ground will be issued by Deadline 9.
Outstanding concerns				
4.11	Natural England	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Natural England summarise any remaining concerns that it has about the Applicant's consideration of the Peak District National Park?	National Highways has no comments to make.
4.12	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of the Peak District National Park?	National Highways has no comments to make.
4.13	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways response
4.	Peak District National Park			
			remaining concerns that it has about the Applicant's consideration of the Peak District National Park?	
4.14	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of the Peak District National Park?	National Highways has no comments to make.

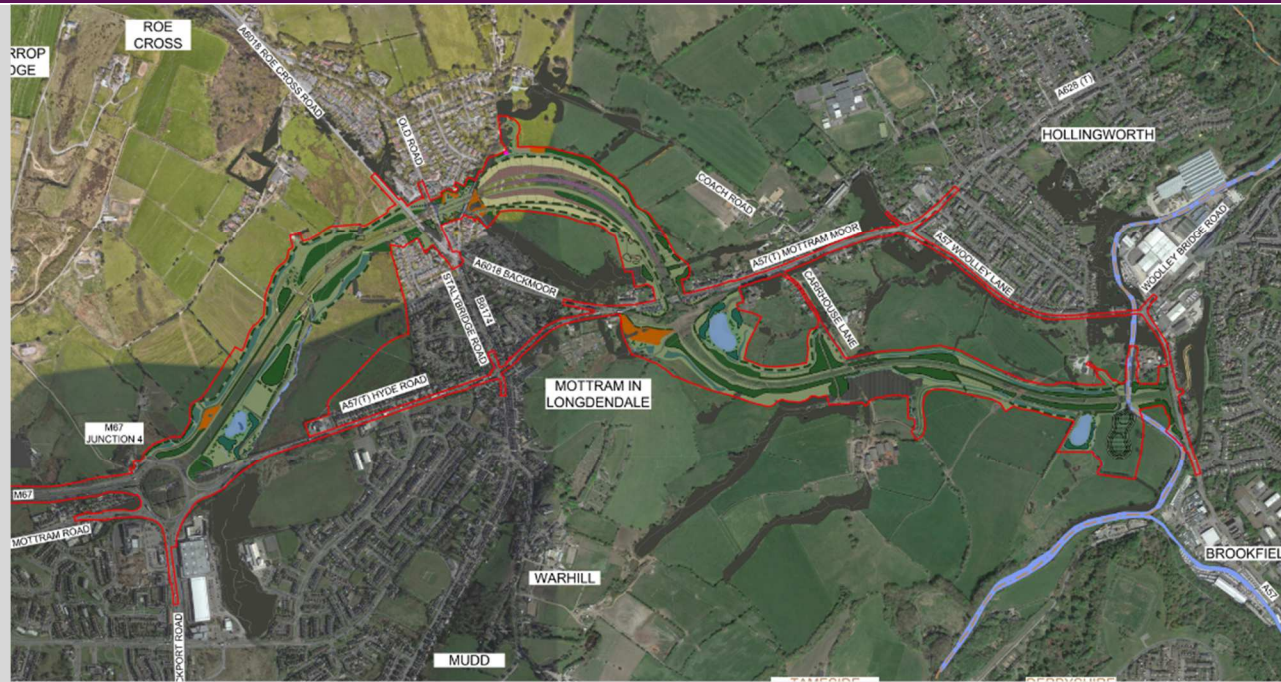
6. Other landscape and visual, design, Green Belt

No	Question to	Reference	Question	National Highways' response
5.	Other landscape and visual, design, Green Belt			
	Landscape and visual			
5.1	Applicant	LUC Landscape Character and Sensitivity Assessment (part of evidence base for Places for Everyone Joint DPD) GM Urban Historic Landscape Characterisation Project (GMUHLC)	Please could the Applicant provide an explanation of the differences between the documents used to establish the baseline and the more recent Landscape Character Assessment prepared for Places for Everyone Joint DPD, and confirm any implications for the conclusions of the Landscape and Visual Impact assessment and update ES Chapter 7 [REP2-007] accordingly?	<p>With reference to the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA) that accompanies the Places for Everyone Joint Plan, the Applicant has used landscape character assessments that are appropriate in the LVIA produced. In their Written Representation (REP2-069), CPRE have used an alternative character assessment which they describe as 'substantially the same but with subtle differences'. Additionally, this document was not raised by the consultees during the consultation period, when establishing the methodology.</p> <p>A comparison of the GMLCSA and the assessments used in the ES Chapter 7 shows that:</p> <ul style="list-style-type: none"> the Deep Peak Western Fringe Valley Pastures with Industry LCT used in the ES generally aligns geographically with the Open Moorlands and Enclosed Upland Fringes (Dark Peak) LCT used in the GMLCSA. The key characteristics are almost identical in that both describe a landscape of undulating, transitional from valley floor to higher ground. Both refer to mosaics or networks of wetland features, both describe pastoral landscapes with hedgerows and drystone walls and both mention winding lanes or rural networks of lanes. There are very subtle differences, for example, in the description of vernacular building types. the Riverside Meadows LCT described in the ES aligns with the Incised Urban Fringe Valleys River LCT and River Etherow LCA described in the GMLCSA. The key characteristics are similar with both describing a landscape of gentle river valley floors, small or small to medium field patterns in a pastoral landscape. Both note fields are enclosed by hedgerows though there are subtle differences e.g. the GMLCSA describes these as 'gappy' and also notes drystone walls. <p>Overall, the GMLCSA is more descriptive in the language used but essentially the key characteristics of the landscape are included with both publications and the mapped LCTs are on a very similar geographic footprint. Therefore, there would have been no change to the assessment levels of significance had the GMLCSA been used in the assessment. Accordingly, Chapter 7 of the ES does not need to be updated.</p>
5.2	Peak District National Park Authority	National Planning Policy Framework and local policy	The Applicant [REP2-021 Q5.1] set out its consideration of the July 2021 update to the National Planning Policy Framework. Is the Peak District National Park Authority satisfied with the Applicant's explanation?	

No	Question to	Reference	Question	National Highways' response
5. Other landscape and visual, design, Green Belt				
5.3	Applicant	Views from the B6015 north of junction with Padfield Road adjacent to public access land	<p>During its second Unaccompanied Site Inspection [EV-012] the ExA noted the views of the area of the Proposed Development from the B6015 north of junction with Padfield Road adjacent to public access land.</p> <p>The Applicant [REP4-008 Item 4f] said that a night-time photomontage in this location can be discounted within the assessment due to the distance.</p> <p>Derbyshire County Council [REP4-010 Item 4f] said that a night-time photomontage might be of value in demonstrating how the proposed mitigation could be effective e.g. the absence or choice of street lighting, planting, etc.</p> <p>Peak District National Park Authority [REP4-012 Item 4f] said an assessment of visual impacts from this view-point would be valuable. It said that the location is on the edge of the National Park boundary and looks across to the scheme location and the view represents the transition of the landscape from the National Park and its rural fringe towards the urban landscape of the scheme's location. It added that a night-time photomontage would be helpful to consider potential effects on dark skies.</p> <p>Please could the Applicant respond and comment on whether an assessment or photomontage has been produced for any viewpoints within the Peak District National Park that have comparable visibility of the Proposed Development? The visibility of the Proposed Development from this location appears to be less shielded by topography and vegetation than the other considered within the National Park.</p>	<p>No night-time photomontages have been produced within the study area. Also, no photomontages have been produced for views within the PDNP. This is due to the distance of the nearest part of the Scheme from the PDNP boundary (approx. 2.2km) for which individual proposed lighting sources/elements would not be distinguishable from the existing components of the view. Also, the Scheme is located in an area with existing bright light as indicated in the screenshot below (with the Scheme location and approximate viewpoint locations added). For these reasons, it is considered that a night-time photomontage would not be beneficial.</p> <p>Source: CPRE website 'England's Light Pollution and Dark Skies'; https://www.nightblight.cpre.org.uk/maps/</p>  <p>With regard to other comparable viewpoints in the National Park, the nearest ones in this broad vicinity are Viewpoint 15, 18 and 28. They all have distant views towards the Scheme at distance of over 2km and it was concluded in ES Chapter 7 Landscape and visual (REP2-007) that the Scheme would be almost non-distinguishable against the baseline view. ES Appendix 7.1 (REP2-014), Table 1-2 states that all of these receptors at Viewpoints 15, 18 and 28 would have a neutral effect by Year 15. Whilst the precise location of this suggested viewpoint from the B6015 north of Padfield Road has not been identified by the Examining Authority it is considered that the likely effect would be no different to the viewpoints mentioned above. Furthermore, this location is at about 3km</p>

No	Question to	Reference	Question	National Highways' response
5.	Other landscape and visual, design, Green Belt			
5.4	Applicant Tameside Metropolitan Borough Council Derbyshire County Council Peak District National Park Authority	Modelled levels and limits of deviation	<p>The Applicant [REP2-021 Q5.5] said that the assessment was based on alignment overlain on existing ground levels plus 4.5m to simulate HGV and subsequently [REP4-008 Item 4h] added that the assessment acknowledged the presence of embankments, false cutting and landform generally.</p> <p>The Applicant [REP4-008 Item 4h] set out the level differences from existing ground level, which included carriageways at the following approximate heights above existing ground level:</p> <ul style="list-style-type: none"> • Section 3: 3-5m • Section 4: 6-10m • Section 8: 3-4m • Section 11: 3m • Section 12: 2-3m • Section 13: 5m • Section 14: 4-5m • Section 15: 2-2.5m <p>False cutting or bunds were noted at the following approximate heights above existing ground level:</p> <ul style="list-style-type: none"> • Section 4: 5m higher than proposed carriageway levels • Section 10: 1-4m • Section 11: up to 6m <p>Sections are provided in the Engineering Drawings and Sections drawing [REP5-005]. These indicate that some embankments, including Section 4, would be topped by 2.5m high environmental barriers.</p> <p>The Applicant [REP4-008 Item 4h] said that vertical limits of deviation were not considered likely to result in changes in levels of significance for landscape or visual receptors.</p> <p>a) Please could the Applicant provide more detailed clarification about how these departures from existing ground level were considered in the assessment? Given the scale of the height differences, how did it consider the potential for the Proposed Development to be visible from locations where existing ground levels would not be visible?</p>	<p>from the nearest part of the scheme and it is considered that intervening topography will obscure much of the Scheme.</p> <p>It should be noted, as a correction to Written summary of Applicant's case at Issue Specific Hearing 2 (REP4-008), that at Section 4 the carriageway will be approximately between 5 to 8m above existing levels and not 6 to 10m as previously described.</p> <p>a) Written summary of Applicant's case at Issue Specific Hearing 2 (REP4-008), Item 4h stated that vertical limits of deviation of 0.5m (increase or decrease) and of 1m for structures (increase or decrease) were not considered likely to result in changes in levels of significance for landscape or visual receptors, as these changes are relatively small. Section drawings were used by the assessor on site and, these, along with professional judgement were used to determine the magnitude of change and significance levels.</p> <p>b) The ZTV is a high-level 2D theoretical exercise only. Actual likely visibility of the Scheme was checked during site visits. The photomontages were produced using the engineers model files.</p> <p>c) Table 2.8 in Chapter 2 of the ES (REP1-014) sets out the plant equipment. Whilst Chapter 2 records the type of equipment proposed it does not provide explicit heights and an assumption was made as to the height based on the type of plant proposed. At this stage, there is no detailed information to determine where the contractor will utilise plant. Therefore, an assumption was made for assessment purposes that plant would be utilised across the entire Scheme.</p>

No	Question to	Reference	Question	National Highways' response
5.	Other landscape and visual, design, Green Belt			
			<p>b) Please could the Applicant clarify whether the photomontages [APP-099 to APP-107] and the drawings of the Zone of Theoretical Visibility [APP-095 and APP-096] are consistent with the levels identified [REP4-008 Item 4h]?</p> <p>c) How has the Applicant considered the height of the construction plant and equipment relative to existing ground level, for example when plant is operating at the top of a new embankment?</p> <p>d) Please could Tameside Metropolitan Borough Council, Derbyshire County Council and Peak District National Park Authority comment?</p> <p>e) Are the authorities content that the height differences and the environmental barriers have been appropriately considered in the assessment of effects for landscape or visual receptors?</p>	
5.5	Applicant Derbyshire County Council	Environmental Masterplan [APP-074 Figure 2.4] Outline Landscape and Ecological Environmental Management and Monitoring Plan [REP5-018]	<p>Derbyshire County Council [REP4-010 Item 4j] commented on the Environmental Masterplan [APP-074 Figure 2.4]. Please could the Applicant respond? Should the landscape proposals respond more to the character of the immediate and wider landscape and not just simply attempt to hide the road. Is it possible to do both?</p> <p>Derbyshire County Council [REP4-010 Item 4n] commented on a previous version of the outline Landscape and Ecological Environmental Management and Monitoring Plan [REP3-022].</p> <p>a) Please could the Applicant and Derbyshire County Council discuss the comments in the context of the latest update, seek to agree any further updates to the outline Landscape and Ecological Environmental Management and Monitoring Plan [REP5-018], and confirm which matters have been agreed or not agreed? Should the planting mix be revisited?</p> <p>b) Please could the Applicant comment on whether the Register of Environmental Actions and Commitments [REP5-012 GEM1.1] should be updated to reflect that the Landscape and Ecological Environmental Management and Monitoring Plan has been submitted, and information in second iteration EMP would be based on this document?</p>	<p>In response to DCC comments on the Environmental Masterplan (REP4-010), the current landscape design responds to both the local and wider landscape character as well as providing screening from key visual receptors of the road. This has been achieved by designing landform and planting patterns which reflect the local character and landscape context with a mixture of both open and enclosed sections of highway. The planting patterns reflect those found in the locality with a mixture of vegetation including woodland blocks, hedgerows and areas of scrub with some open sections which contain scattered trees and grasslands as well as more formal sections where the highways intersect with Mottram and the existing A57. The planting also provides key habitats for wildlife and contributes to maximising biodiversity opportunities, performing many functions beyond mere screening of the proposed highway. Final species selections will also ensure that the planting responds to both the immediate landscape context and the wider setting. A figure illustrating the Environmental Masterplan is contained in Examination document 9.64 'Environmental Masterplan Overview submitted at Deadline 6 alongside this response.</p>

No	Question to	Reference	Question	National Highways' response
5.	Other landscape and visual, design, Green Belt			
				 <p>a) Please refer to Section 2 (page 5) of Applicants comments on Deadline 4 submissions (REP5-022) for responses on these comments. The Applicant will discuss any outstanding comments that DCC have on the Outline LEMP, which will be captured in the SoCG. The Outline LEMP provides preliminary species mixes only, this will be revisited during the Detailed Design stage. At this point the planting and seeding proposals will be discussed and agreed with the relevant local planning authorities (including Derbyshire County Council). The agreed detailed specification for planting and seeding will be provided in the detailed LEMP.</p> <p>b) GEM1.1 of the Register of Environmental Actions and Commitments (REAC) (REP5-012) has been updated and resubmitted at Deadline 6 as requested. Section 1.4 of the EMP (First iteration) has also been updated for the resubmitted version at Deadline 6 to provide more clarity on stakeholder consultation for the detailed LEMP.</p>
5.6	Tameside Metropolitan Borough Council High Peak Borough Council	Outline Landscape and Ecological Environmental Management and Monitoring Plan [REP5-018]	Please could Tameside Metropolitan Borough Council and High Peak Borough Council comment on the outline Landscape and Ecological Environmental Management and Monitoring Plan [REP5-018]? Does they share any of Derbyshire County Council's concerns [REP4-010 Item 4n]?	

No	Question to	Reference	Question	National Highways' response
5. Other landscape and visual, design, Green Belt				
5.7	Applicant Local authorities	Management of new structures and the potential for vandalism	CPRE Peak District and South Yorkshire Branch [REP2-069] raised concerns about the management of new structures and the potential for vandalism. a) Please could the Applicant respond? b) Please could the local authorities comment?	The Applicant has considered the location of the proposed structures and discussed this concern with Tameside MBC. The Applicant has no reason to believe there would be a particular issue with vandalism or graffiti at the proposed structure locations. However, the proposed structures will be inspected by the Applicant or relevant local authority as appropriate as part of the routine maintenance regime for those structures. Any vandalism or graffiti identified through routine maintenance inspections would be addressed using treatments sympathetic to the structure and its location.
5.8	CPRE Peak District and South Yorkshire Branch Applicant	Proposed eastern portal and carriageway Landscape and visual impact assessment and potential site inspection	CPRE Peak District and South Yorkshire Branch [REP3-033] suggested a site inspection of private land in the pastures south of Mottram Old Hall to understand the impacts of the Proposed Development, including the proposed eastern portal and carriageway. Future views are noted from a bridleway and by drivers. The Applicant is quoted as saying that there would be no views from sensitive receptors. The ExA is requesting more information on the matters raised by CPRE Peak District and South Yorkshire Branch before deciding if a site inspection should be carried out. a) Please could CPRE Peak District and South Yorkshire Branch clarify the bridleway locations with potential views of the proposed eastern portal and dual carriageway that it is concerned about? b) Please could the Applicant comment on the matters raised by CPRE Peak District and South Yorkshire? How visible would the proposed eastern portal and dual carriageway be from bridleways, other public rights of way, or other sensitive receptors and how have these been considered in the assessment? What consideration has been given to views by users of the proposed carriageway?	a) No response required b) The Applicant considers that the only full views of the eastern portal would be visible from private agricultural land containing no sensitive receptors. There is nowhere on publicly accessible land where the angle can capture the view of the face of the underpass structure. In Figure 7.8 of the ES (APP-097), VP5 (Old Hall Lane) is the closest viewpoint, but this would not have a full view of the facing aspect of the Mottram Moor Underpass structure due to the angle of view. Even from VP6 (PRoW LON/108 Coach Road), it would be difficult to get a full view of the portal, as from this location the view would be oblique and the portal would be set down from the receptor. In Table 1.2 of Appendix 7.1 of the ES (REP2-014), VP5 is the higher of the two impacts between VP5 and VP6, with a residual effect at SY15 of moderate adverse. With regards to consideration of road users, what has been considered for the Scheme is views for receptors on the existing sections of the Scheme (which allows for magnitude of change). Views for road users of the proposed sections of the Scheme have not been considered as there is no existing road baseline to determine magnitude of change from.
Design				
5.9	Applicant Local authorities	Mitigation	The ExA is considering whether mitigation is firmly secured and therefore the extent to which it can be relied on. It is considering if it is necessary to add a Requirement to the dDCO [REP5-006]. The Applicant [REP4-008 Item 4v] said that the aesthetic appearance of the Proposed Development is extremely important in the context of its visibility.	a) No response required b) The Applicant will discuss the document with the local authorities when it is completed. The Outline Design Approach Document will be submitted to the Examination at Deadline 8. c) The Outline Design Approach Document will be appended to the first iteration EMP. The first iteration EMP includes the Register of Environmental Actions and Commitments (REAC) (REP5-012) and is already a certified document listed at Schedule 10 of the draft DCO.

No	Question to	Reference	Question	National Highways' response
5.	Other landscape and visual, design, Green Belt			
			<p>Tameside Metropolitan Borough Council [REP5-031] Item 4v] said that aesthetics are very important for the landscape and it is particularly important that mitigations are fully discussed with and agreed with Tameside Metropolitan Borough Council during detailed design.</p> <p>The Applicant [REP4-008] Item 4y] said that:</p> <ul style="list-style-type: none"> • It agreed to prepare a Design Approach Document, and provided a contents list for that [REP5-001] Annex 1]. • A Design Champion could be appointed to take on the responsibility of achieving sustainable design across the project in an integrated manner, to take on the lead author responsibility of a design approach document that would identify approaches for all engineering and environmental design and ensure that delivery and objectives identified in the design approach document during the Detailed Design and Construction stages. • It agreed to a further Design Review by the Design Council to receive constructive comments on the Scheme design as it evolves into the Detailed Design stage prior to construction. • Close collaboration would proceed with external parties, in the Detailed Design and construction phases, working closely with Tameside Metropolitan Borough Council and Derbyshire County Council, for example, to agree Scheme proposals on the single carriageway section and junctions, and also with Transport for Greater Manchester in terms of the new junction design. • The mitigation measures would be secured through the LEMP, EMP and REAC, through Requirement 4 of the draft DCO Schedule of Requirements. <p>a) Please could the local authorities comment on the contents of the Design Approach Document [REP5-001] Annex 1]?</p> <p>b) Please could the Applicant discuss the Design Approach Document with the local authorities and submit an Outline Design Approach Document to the Examination?</p> <p>c) Please could the Applicant clarify whether the Outline Design Approach Document will be appended to the first iteration EMP [REP3-010] [REP5-012]? If not, how will it be certified by the dDCO?</p>	<p>d) The response to c) above confirms that the Outline Design Approach Document will be appended to the first iteration EMP. It is important to record the interplay between the different documents in order to understand how the mitigation required for the authorised development is appropriately secured:</p> <ul style="list-style-type: none"> • The first iteration EMP reflects the preliminary design and records the approach to managing and mitigating the effects of the authorised development. • The Outline Design Approach Document will guide the formulation of the final detailed design. • The REAC sets out the mitigation committed for the authorised development. The first iteration EMP and Outline Design Approach Document will need to be developed further once the detailed design has been settled. Requirements 3 and 4 of the draft DCO require the detailed design to be compatible with the preliminary design and for the second iteration EMP to be substantially in accordance with the first. This is not an absence of precision; it is wording which accurately permits those documents to be updated to reflect the evolution of the detailed design and secure the necessary management and mitigation requirements to ensure the authorised development is appropriately constructed. Requirement 4(2)(a) requires the second EMP to be in accordance with the mitigation measures in the REAC. Again, this is not at absence of precision; it reflects the fact that the mitigation measures relevant to the construction stage from REAC will be inserted into the second iteration EMP at section 3 (see para 3.1.3 of the first iteration EMP). Any remaining matters relating to post construction or the operation of the authorised development will be included in the third iteration EMP (see para 3.1.4 of the first iteration EMP). <p>The Applicant will maintain dialogue with the local authorities in relation to the development of the plans which will be included in the second iteration EMP. In any event, requirement 4(1) expressly requires those authorities and the Environment Agency to be consulted on the EMP (Second iteration) before it is submitted to the Secretary of State for Transport for approval. As the Design Approach Document will be appended to the EMP, it will be included within this requirement.</p> <p>Finally insofar as this question is directed towards the importance of landscaping, requirement 5 necessitates that the authorised development is landscaped in accordance with the landscaping scheme which has first been approved in writing by the Secretary of State in consultation with the relevant planning authority prior to that part of the authorised development coming into use. Requirement 5(2) further mandates that the landscaping scheme must reflect the measures contained in the REAC.</p> <p>The Applicant respectfully contends that all required mitigation is therefore appropriately secured.</p>

No	Question to	Reference	Question	National Highways' response
5. Other landscape and visual, design, Green Belt				
			d) Please could the Applicant suggest how the secured mitigation could be made firmer and more precise, and suggest wording for the dDCO?	
5.10	Applicant Local authorities Peak District National Park Authority	Lighting	a) Please could the Applicant set out the consideration given to design options for street lighting, including the height and spacing, whether it can be omitted, and how light pollution and glare could be mitigated. b) Please could the local authorities and Peak District National Park Authority comment?	a) The lighting provision along the new link road has been designed with lower height columns to reduce the visual impact and minimise the disruption to routes across the highway identified as potential bat crossings. Landscaping proposals on the edges of the highway will be included to further mitigate the impact. Please refer to section 2.5.20-2.5.29 of Chapter 2 The Scheme of the ES (REP2-005) for further details of the lighting design approach. b) No response required
Green Belt				
5.11	Applicant Tameside Metropolitan Borough Council	Openness NPSNN paragraphs 5.170, 5.171 and 5.178 NPPF paragraph 150(c)	Paragraphs 5.170, 5.171 and 5.178 of the NPSNN deal with proposals in the Green Belt. There is a general presumption against inappropriate development in the Green Belt. Such development should not be approved except in very special circumstances. Applicants should determine whether any development within the Green Belt may be considered inappropriate development within the meaning of Green Belt policy in the NPPF. Paragraph 150(c) of the NPPF states that local transport infrastructure which can demonstrate a requirement for a Green Belt location is not inappropriate development if it preserves openness. The Applicant [REP2-016 paragraphs 7.5.36 to 7.5.40] has set out its consideration of openness, noting the uses of cuttings, false cuttings and embankments. It said that the Proposed Development had been designed to sit at a low level in the landscape. The Applicant [REP4-008 Item 4h and REP5-005] has provided Engineering Drawings and Sections drawings and set out the level differences from existing ground level, which included carriageways at up to 10m above existing ground level, bunds at up to 6m above carriageway levels, and environmental barriers up to 2.5m high. a) Please could the Applicant clarify in greater detail, having regard to the spatial and visual components of openness, why the elevated sections of carriageway, cuttings, false cuttings, embankments, bunds, structures, and signage would not affect openness?	a) The Applicant considers that the Scheme does not constitute inappropriate development as it preserves openness. Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume; <ul style="list-style-type: none"> In assessing the various elements of the Scheme (including elevated sections, cuttings, false cuttings, embankments, bunds, structures and signage) the landscape and visual receptors likely to be affected by these elements, either singularly or in combination, have been identified and assessed. In total 169 viewpoints representing a range of visual receptors (including many clustered groups), were identified representing a diverse range or receptor types (including residential, recreational and commercial). All of the areas of land surrounding the urban areas within the Draft Order Limits are designated as forming part of the Tameside Greenbelt. The receptors are dispersed along the Scheme and have views both close range, mid-range and distant and the many are located within the Green Belt. The following viewpoints specifically mention open view or openness as indicated in Appendix 7.1 of the ES (REP2-014) (VP4, VP5, VP7, VP8, VP13, V-R-11, V-R-12, V-R-13, V-R-14, V-R-15, V-R-29, V-R-36, V-R-37, V-R-53, V-P-06, V-P-08-1, V-P-09, V-P-09-1, V-T-05, V-To 07, V-T-08, V-O-06). It is worth noting that of the many remaining viewpoints, open views may not be specifically mentioned, though they are located in the Green Belt. Similarly, 25 landscape character areas were assessed comprising of 14 published LCAs and a further 11 Scheme Level Landscape and Townscape Character Areas. Of the 22 viewpoints listed above which specifically mention open views/openness, 7 are considered to be large significant adverse in WY1 and moderate significant adverse in SY15. Ten are considered to be moderate adverse at WY1 and slight adverse by SY15 with the remaining five considered to be slight or neutral at WY1

No	Question to	Reference	Question	National Highways' response
5.	Other landscape and visual, design, Green Belt			
			<ul style="list-style-type: none"> • Which consideration has been given to receptors near those receptors? • Have any of the viewpoints have been prepared to show visual links between the wider green belt and how the Proposed Development would affect visual openness? • What are the spatial and visual effects on the Green Belt? • Would there be an effect on the openness of the Green Belt? • Would there be material harm to openness? <p>b) Please could Tameside Metropolitan Borough Council comment?</p>	<p>or SY15. This considers the spatial and visual effects for receptors within the Green Belt.</p> <ul style="list-style-type: none"> • There are residual moderate (significant) effects for some receptors at SY15. In some locations views are opened up for receptors. Mitigation planting will reduce views for some visual receptors but retain open views for other receptors as considered appropriate to align with landscape character and yet balance screening of the Scheme. • In response to material harm to openness, it is considered that the Scheme aligns with localised landscape character and balances the locations where screening using mitigation planting is appropriate. The answer provided above for question 5.5 illustrates how the landscape design will be aligned to local landscape character in reflecting local planting patterns and vegetation types as well as creating a variety of open and enclosed views both towards the new highway as well as within it, to appreciate the local landscape character. The ES Chapter 7 para. 7.9.13 and 7.9.14 state that no Landscape and Townscape Character Areas are adversely affected by design year 15. <p>b) No response required</p>
Remaining concerns				
5.12	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of landscape, visual, design, or the Green Belt?	National Highways has no comments to make.
5.13	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of landscape, visual, design, or the Green Belt?	National Highways has no comments to make.
5.14	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of landscape, visual, design, or the Green Belt?	National Highways has no comments to make.
5.15	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of landscape, visual, design, or the Green Belt?	National Highways has no comments to make.

7. Other noise, vibration, and nuisance

No	Question to	Reference	Question	National Highways' response
6.	Other noise, vibration, and nuisance			
Study area, baseline conditions and overall assessment methodology				
6.1	Local authorities	Public rights of way	<p>The Applicant [REP4-008 Item 2a] provided an assessment of noise impacts on public rights of way. The assessment suggests that some perceptible differences, including some exceedances of significant observed adverse effect level. The Applicant concludes that the effects are not significant due to transient nature of users and therefore the duration of the interaction with the Proposed Development.</p> <p>Do the local authorities have any comments on the assessment and the conclusion that there would be no significant effects?</p>	National Highways has no comments to make.
6.2	Applicant	Baseline noise levels	<p>High Peak Borough Council [REP5-036 Item 2c] said that the first iteration EMP [REP3-010 REP5-012] lacks detail on the noise monitoring to be undertaken in the area of 18 and 54 Woolley Bridge e.g. Annex B2: Noise and Vibration Management Plan 2.6.3 notes "Woolley Bridge".</p> <p>a) Please could the Applicant respond? Can more detail be provided and agreed with High Peak Borough Council?</p> <p>The Applicant [REP4-008 Item 2b] suggested that there may be a lower baseline in the area of 18 and 50 Woolley Bridge than considered in the assessment.</p> <p>b) Please could the Applicant comment on the potential for a lower baseline to result in an assessment of significant adverse effects?</p>	<p>a) As stated in National Highways' response to First Written Question 9.3 (REP2-021), baseline noise monitoring will be undertaken at Woolley Bridge. The baseline noise monitoring methodology, number of survey positions and their location(s) will be discussed and agreed with High Peak Borough Council during May 2022 in advance of planned updates to the construction noise assessment during the detailed design stage. As a minimum, it is envisaged that unattended continuous baseline noise monitoring would be undertaken for one week at one location sited in the vicinity of 18 Woolley Close as this sensitive receptor was predicted higher construction noise levels than 54 Woolley Bridge.</p> <p>Noise monitoring during the construction phase would ideally take place at the same location(s), with additional sites added as required. The balance between attended and unattended monitoring can be confirmed once a detailed construction programme is available.</p> <p>b) Table 11.22 of ES Chapter 11: Noise and vibration (REP3-007) shows that adverse effects were predicted at 18 and 54 Woolley Bridge for daytime and night-time construction works. If future noise monitoring at Woolley Bridge indicates that the most stringent threshold noise levels stated in Table 11.2 of the ES should be applied to the assessment, this would correspond to SOAELs of 65dB LAeq for weekday daytime works and 45dB LAeq for night-time works.</p> <p>Applying these threshold levels to the predicted residual construction noise levels provided in ES Appendix 11.3 (Table 11.3.2, APP-176) shows that three more construction activities would exceed the SOAEL at these locations. These activities</p>

No	Question to	Reference	Question	National Highways' response
6.	Other noise, vibration, and nuisance			
				are enabling works (Phase 1), landscaping (Phases 3, 4 and 5) and installation of street furniture (Phase 4). Neither of these activities would take place for the required duration for a significant effect to take place. Therefore, no significant effects would occur if the baseline noise levels at Woolley Bridge are lower than assumed in the ES.
	Construction phase			
6.3	Local authorities	Noise sources with distinctive characteristics	The Applicant [REP4-008 Item 2f] said that the assessment methodology does not require any special treatment or consideration for noise sources with distinctive tonal, impulsive or low frequency characteristics, although variation in spectral characteristics of specific construction plant has been considered. Are the local authorities content that the Applicant given enough consideration to distinctive tonal, impulsive, or low frequency characteristics including, but not limited to, percussive piling?	National Highways has no comments to make.
6.4	Applicant	Section 61 consents	<p>High Peak Borough Council [REP5-036 Item 2g] said that the s61 process does not mean that there would be no additional impacts or indeed that noise impacts would not be significant, only that the applicant will control these impacts in accordance with Best Practicable Means. It said that, typically, if an activity is infrequent or unexpected then it would not anticipate that it would be included in the assessment, but that if some of the activities listed were likely to become embedded, for example, nightly routine equipment maintenance then this should be included. There is also possibly some unknown element to this, as the application of s61 is appears to be at the discretion of the Principal Contractor.</p> <p>a) Please could the Applicant comment? Which activities would be likely to be infrequent or unexpected and which would be likely to become embedded? How certain is that?</p> <p>The Applicant [REP4-008 Items 2g and 2h] said that the Section 61 application process would “ensure that construction works including night working would not give rise to any materially new or worse effects”.</p> <p>b) How is that secured?</p> <p>c) If it is not, how can the ExA be satisfied that the flexibility provided using the Section 61 process is consistent with the assessment representing a reasonable worst-case scenario?</p>	<p>a) The appointed Principal Contractor's preference is to undertake the main works during the daytime as much as practically possible. No activities are planned that would routinely take place at night. Where out of hours works do occur, these would occur infrequently and are mostly expected to be related to interfacing with the existing carriageway. Local authorities will be engaged with throughout the construction phase and consulted on planned out of hours working and mitigation measures, with decisions based on the best outcome/least disruption for all parties.</p> <p>b) This will be secured through the agreement of mitigation measures with local authorities during the Section 61 process and implementation of measures in the detailed Noise and Vibration Management Plan (NVMP) (Annex B2 to Environmental Management Plan First Iteration (REP3-022) and Register of Environmental Actions and Commitments (REAC) (REP5-012). Where additional measures are required, these will be agreed with the relevant local authorities and added to the detailed NVMP.</p> <p>c) This will be secured as discussed in part (b) above. During the Section 61 process, there will be discussions with the relevant local authorities involved in the decision-making process and the Applicant will seek approval from them that a reasonable worst-case scenario has been assessed.</p>

No	Question to	Reference	Question	National Highways' response
6. Other noise, vibration, and nuisance				
6.5	Applicant	Night works	<p>Paragraph 11.12.1 of ES Chapter 11 [REP3-007] states that “no night works are anticipated with the exception of traffic management”? At Issue Specific Hearing 2 [EV-016] the Applicant confirmed that was the basis of the assessment.</p> <p>Requirement 4 of the dDCO [REP5-006] lists activities permitted outside normal working hours, which would include night works.</p> <p>a) What hours are considered for night works in the assessment? b) Does it need to be ensured that only traffic management will be permitted during the hours considered for night works? c) If not, how can the ExA be satisfied that the assessment represents a reasonable worst-case scenario?</p>	<p>a) Out of hours works could take place during the evening or at night-time. Definitions of these time periods are provided in BS 5228 Part 1 (Table 11.2 of ES Chapter 11: Noise and vibration (REP3-007)), which are 19:00-23:00 for weekday evenings and 23:00-07:00 for night-time. The hours considered in the construction noise assessment correspond to the time periods as defined in BS 5228 Part 1.</p> <p>The local authorities have permitted hours for road closures where these are required for out of hours working. These permitted hours may differ from the time period definitions used in the construction noise assessment, and will be stated in any Section 61 applications made.</p> <p>Construction activities identified during the preliminary design that would take place out of hours were assessed as taking place at night. This ensured that a reasonable worst-case assessment was undertaken as BS 5228 Part 1 (and the DMRB LA 111) assign lower SOAEL values to night-time working than evening-working.</p> <p>b) As discussed in Question 6.4a, some additional one-off activities will need to take place at night.</p> <p>c) Paragraph 11.3.13 of the ES states that “a significant effect potentially occurs where a moderate or major construction noise magnitude of impact is predicted for 10 or more days in any 15 consecutive days or nights, or a total number of days exceeding 40 in any 6 consecutive months”. The appointed Principal Contractor has indicated that the additional one-off activities for out of hours works mentioned in the dDCO (REP5-006) would not meet the required duration criteria for significant effect.</p>
6.6	Applicant Local authorities	Percussive piling	<p>The Applicant [REP4-008 Item 2i] said the intention is that percussive piling would only be used where rotary bored piling is not feasible. ES Chapter 11 [REP3-007] refers to significant adverse effects for piling and suggests that percussive piling would be likely to result in more adverse impacts than rotary bored piling.</p> <p>The ExA would like to ensure that appropriate mitigation is secured.</p> <p>a) Should restricting the use of percussive piling to when rotary bored piling is not feasible be secured as necessary mitigation?</p> <p>The Applicant [REP4-008 Item 2k] has listed other mitigation measures for percussive piling.</p> <p>b) Should those measures be added to the Outline Noise and Vibration Management Plan [REP3-010 Annex B2]?</p>	<p>a) The decision to include percussive piling over rotary bored piling considers a balanced approach by assessing environmental, design and construction constraints / opportunities collectively, as well as low carbon considerations (as part of the PAS 2080 process). On balance, the best option may be to use percussive piling, even though this is not the preferred option from a noise impact perspective, or if rotary bored piling is feasible. If percussive piling solutions are incorporated in the detailed design, then suitable mitigation measures will, however, be applied, which are referred to in the response to part b) of this question.</p> <p>b) The mitigation measures for percussive piling stated in item 2k of the Written summary of Applicant's case at Issue Specific Hearing 2 (REP4-008) are already included in the</p>

No	Question to	Reference	Question	National Highways' response
6.	Other noise, vibration, and nuisance			
6.7	Applicant Tameside Metropolitan Borough Council High Peak Borough Council	Mitigation	<p>Tameside Metropolitan Borough Council [REP5-031 Item 2I] said that details of the proposed complaints process should be provided together with how this will be managed. It also said that the scope and extent of monitoring to be implemented before works commence should be detailed.</p> <p>High Peak Borough Council [REP5-036 Item 2I] said that some of the commitments, notably monitoring, lack any real clarity or commitment and should be more focussed. It said that all environmental commitments made when undertaking the environmental assessments should be secured, for example a statement that Best Practicable Means will be adopted for all activities would be expected.</p> <p>a) Please could the Applicant comment?</p> <p>b) Please could the Applicant, Tameside Metropolitan Borough Council and High Peak Borough Council discuss the comments, seek to agree any further updates to the first iteration EMP [REP3-010 REP5-012], and confirm which matters have been agreed or not agreed?</p>	<p>Outline Noise and Vibration Management Plan (REP3-010, Annex B2) in paragraphs 2.5.5 to 2.5.7.</p> <p>a) Complaints</p> <p>The EMP (First iteration) (REP3-010) states that the appointed Principal Contractor Community Liaison Manager will document and respond to complaints from members of the public. Warnings about any particularly noisy works will be sent to local residents in advance, explaining what will be happening and who to contact with any issues. The appointed Principal Contractor will also liaise with the local authorities in advance to agree a joint communication strategy when necessary. Complaints sent to TMBC in error can be forwarded to National Highways. the appointed Principal Contractor will deal with issues raised and provide responses.</p> <p>The Outline NMVP and Outline Nuisance Management Plan (NMP) (Annex B of the EMP (First iteration) (REP3-010) both provide details of the communication and complaints arrangements. These details will be expanded in full in the detailed NVMP and NMP that will be produced at Detailed Design Stage, prior to works commencing, and included in Annex B of the EMP (Second iteration). Requirement 4 of the draft DCO sets out that relevant local authorities will be consulted on the EMP (Second iteration) before it is submitted to the Secretary of State for Transport for approval.</p> <p>Commitments</p> <p>Register of Environmental Actions and Commitments (REAC) (REP5-012). item NV1.1 includes a commitment to implement the NVMP, which states requirements for good working practices to be followed and for implementing Best Practicable Means. Paragraph 2.4.4 of the Outline NVMP (REP3-010) states the following mitigation hierarchy:</p> <ol style="list-style-type: none"> 1. Best Practicable Means 2. Specific noise and vibration control measures (which includes those measures referred to in Q6.6b above for percussive piling) 3. Offer of temporary relocation <p>The Outline NVMP (paragraph 2.6.1) states that the construction noise monitoring methodology and number of locations will be discussed and agreed with the local authorities. These discussions will take place during the Detailed design of the Scheme, and the Detailed NVMP will include further information reflecting the outcomes of these discussions.</p>

No	Question to	Reference	Question	National Highways' response
6. Other noise, vibration, and nuisance				
6.8	Applicant Local authorities	Noise insulation and temporary housing	<p>The Applicant [REP2-021 Q9.13] said that the process and triggers for noise insulation or temporary housing set out in in Section E.4 of BS 5228:2009 Part 1 would be followed. The Applicant [REP4-008 Item 2m] said that threshold noise levels would be secured in the Noise and Vibration Management Plan.</p> <p>Should the process, triggers and example threshold noise levels for noise insulation and temporary housing set out in Section E.4 of BS 5228:2009 be secured?</p>	<p>b) Any outstanding matters will be dealt with through the Statements of Common Ground with Tameside Metropolitan Borough Council and High Peak Borough Council.</p> <p>This is already secured by Register of Environmental Actions and Commitments (REAC) (REP5-012) item NV1.5, worded as stated in REP4-008 Item 2m. Further details on the process, triggers and threshold noise levels will be included in the EMP (Second iteration)</p>
Operation Phase				
6.9	Applicant Local authorities	Speed control measures	<p>The Applicant [REP4-008 Item 2q] said that there are no assessment methods within DMRB to consider the specific noise and vibration impacts from speed cushions or other similar traffic calming measures.</p> <p>a) Are assessment methods available elsewhere? b) What is the potential for significant noise or vibration impacts from speed cushions or other similar traffic calming measures?</p>	<p>a) No specific assessment methodologies for quantitatively appraising noise and vibration impacts from traffic calming are available. Potential changes to acoustic character as a result of a road scheme are already part of the DMRB LA 111 methodology for establishing overall significance, as shown in Table 11.10 in Chapter 11 of the ES (REP3-007).</p> <p>b) Research by the Department for Transport (Traffic Calming, Local Transport Note 1/07 dated 2007) shows that noise and vibration increases from traffic calming are linked to heavy vehicle traffic flows. The traffic model shows that heavy vehicle traffic on the detrunked road would reduce by 89% with the Scheme in the opening year, from 2466 vehicles to 274 vehicles (AAWT 18h). The design of the speed cushions (height and width) and their position on the road affect the level of noise/vibration generated as vehicles pass over them, as does the laden/unladen weight of the heavy vehicle. The design of the traffic calming measures is being agreed with Tameside Metropolitan Borough Council and will be selected to meet agreed road safety, speed management and environmental outcomes.</p> <p>The reduction in traffic on the detrunked road would result in a significant beneficial effect overall. This is because the 89% reduction in heavy vehicle traffic flow is likely to give rise to a larger benefit than any small changes in character from the remaining 11% of heavy vehicles travelling using the detrunked road and is therefore unlikely to reduce the significant beneficial effect.</p>

No	Question to	Reference	Question	National Highways' response
6.	Other noise, vibration, and nuisance			
6.10	High Peak Borough Council	Operation phase	In their Local Impact Report [REP2-046 Paragraphs 14.27, 14.28 and 14.29] High Peak Borough Council raised concerns about the method used to select the façade point used in the assessment, the number of properties experiencing significant adverse effects, and the location of receptors receiving perceptible increases in road traffic noise and whether those are significant. The Applicant responded at Deadline 3 [REP3-018]. Please could High Peak Borough Council summarise any remaining concerns that it has about these issues?	National Highways has no comments to make.
	Remaining concerns			
6.11	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of noise, vibration, common law nuisance or statutory nuisance?	National Highways has no comments to make.
6.12	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of noise, vibration, common law nuisance or statutory nuisance?	National Highways has no comments to make.
6.13	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of noise, vibration, common law nuisance or statutory nuisance?	National Highways has no comments to make.
6.14	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of noise, vibration, common law nuisance or statutory nuisance?	National Highways has no comments to make.
6.15	Environment Agency	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Environment Agency summarise any remaining concerns that it has about the Applicant's consideration of common law nuisance or statutory nuisance?	National Highways has no comments to make.

8. Air quality

No	Question to	Reference	Question	National Highways' response
7.	Air quality			
7.1	Applicant High Peak Borough Council	Matters raised in High Peak Borough Council's Local Impact Report [REP2-046]	<p><u>Item 8.37.</u> The Applicant has not definitively committed to construction dust monitoring at high-risk sites and said [REP3-006] that it would be considered if necessary to monitor effectiveness of standard mitigation in line with DMRB LA 105 Table 2.108.1.</p> <p>a) Please could the Applicant explain the parameters used to identify whether monitoring would be required?</p> <p>Some high-level information about monitoring is set out in Appendix B7 Nuisance Management Plan to the first iteration EMP [REP3-010].</p> <p>b) Does High Peak Borough Council have any comments on this/ is it sufficient to address their concern about high-risk sites?</p> <p><u>Item 8.38.</u> High Peak Borough Council asked for the A57 Brookfield qualifying features used in the NO₂ compliance assessment to be labelled on ES Figure 5.4 [APP-080].</p> <p>c) Is the Applicant able to do this, please?</p> <p><u>Item 8.39.</u> High Peak Borough Council raised concerns about the non-application of adjustment to modelled NO₂ and PM₁₀ concentrations where the modelled values are within 30% of monitored. High Peak Borough Council [REP4-011] suggest they are concerned about over representation of beneficial effects.</p> <p>d) Please could the Applicant to comment on this, and any implications for the conclusions on effect significance?</p>	<p><u>Item 8.37.</u></p> <p>a) National Highways is committed to updating the EMP (First iteration) at the detailed design stage. The EMP (Second iteration) submitted at this stage will include further detail on the construction monitoring. The local authorities will be consulted on the EMP (Second iteration) as required through requirement 4 of DCO with the parameters used to identify whether monitoring would be required agreed with both the local authority's and appointed Principal Contractor. This approach including timescales for consultation has been discussed and agreed with High Peak Borough Council (HPBC) (virtual meeting held 4 March 2022).</p> <p>b) National Highways has no comment to make.</p> <p><u>Item 8.38.</u></p> <p>As stated in National Highway's response to question 7.2 in REP3-021, given the number of qualifying features and public access receptors included in the compliance assessment it is not possible to practically label them in ES Figure 5.4 (APP-080) however, an extract of ES Figure 5.4 zoomed in on the A57 Brookfield area with receptor ID labels for qualifying features and public access receptors adjacent to the A57 Brookfield will be provided.</p> <p><u>Item 8.39.</u></p> <p>c) The HPBC query relates to the verification and adjustment of the Department for Environment, Food and Rural Affairs (Defra) mapped background concentrations rather than that of the modelled total NO₂ and PM₁₀ concentrations at sensitive receptors. National Highways response to question 8.39 is provided in REP3-018. As stated in REP3-018, where the Defra background maps underpredict background monitoring data this could lead to a need to apply a higher adjustment factor in the air quality model verification. The higher the adjustment factor applied, the more conservative the results of the assessment given that the adjustment is applied to both the modelled total concentration with and without the Scheme, which has the effect of increasing the change in concentration. Where concentrations are expected to decrease with the Scheme this could lead to some over representation of the benefits in the results, however, given the balance of benefits and disbenefits this is not considered to impact the overall conclusions on significance of effect, which is stated in the ES as not having a significant adverse effect on air quality due to the Scheme. National Highway's response to question 8.43 in REP3-018 provides an explanation of the DMRB LA 105 terminology regarding significance as applied to beneficial effects.</p>

No	Question to	Reference	Question	National Highways' response
7.	Air quality			
				The approach to the background concentrations used in the air quality assessment has been further discussed and agreed with HPBC (virtual meeting held 4 March 2022)
7.2	Applicant	Road gradient	<p>The ExA understands that DEFRA guidance (DEFRA LAQM TAG16 paragraph 7.449) suggests identification of all roads with a gradient of more than 2.5% for the modelling of gradient effects.</p> <p>a) Please could the Applicant clarify where the criteria that it has used for roads of more than 6% gradient is derived?</p> <p>b) Please could the Applicant confirm which roads within the study have a gradient of more than 2.5% and how the potential increase in emissions, especially from HDV exhaust, has been considered in the assessment? Can they confirm that there is no risk that excluding these gradient effects has resulted in an under reporting of effects.</p>	<p>a) Road gradients across the study area vary widely with a large number of locations with gradients of more than 2.5%. Gradient undulations along individual stretches of road mean that to account for smaller gradients (between 2.5% and 6%) consistently across the model, multiple traffic model links would need to be split into gradient specific sections. Given the size of the study area and nature of the model, there was a need to be proportionate in the approach to model set up. Therefore, when the gradient effect was introduced whilst improving the model as part of the model verification process there was a focus on A-roads within air quality management areas (AQMAs), locations where model verification was below acceptable performance, and locations with more considerable gradients (6% or greater). Although Defra Local Air Quality Management Technical Guidance (LAQM.TG16) provides relevant guidance on air quality modelling methodology, it's primary focus is on assisting local authorities with review and assessment of air quality for local air quality management and is therefore more applicable to much smaller model study areas focused on specific locations with known poor air quality where a more detailed approach to the inclusion of gradient effects may be appropriate. National Highway's DMRB LA 105 is designed for larger scale modelling exercises as required for strategic highways projects and does not require the inclusion of gradient effects in model set up. The selection of a criteria of 6% was used as this is the maximum gradient for which the Defra Emission Factor Toolkit (EFT v10.1) will calculate a gradient effect on vehicle emissions.</p> <p>As stated above, road gradients across the study area vary widely with a large number of locations with gradients of more than 2.5%. It is not considered to be practical to identify all individual sections of road with a gradient over 2.5%. For those link sections modelled with gradient effects the impact on HDV emissions have been accounted for in the calculation. Gradient effects, where relevant, have been included in the model, for those locations which are at risk of exceeding Air Quality Strategy objectives and therefore the inclusion of wider gradient effects across the study area is considered unlikely to impact the overall conclusions or Scheme assessment of significant of effects.</p>

No	Question to	Reference	Question	National Highways' response
7. Air quality				
7.3	Applicant High Peak Borough Council	Air quality modelling	<p>High Peak Borough Council [REP4-011 Items 7t to 7v] has raised a number of concerns, including in relation to road gradient effects, data, model verification and improvement, and modelling. It requested examples of results obtained for receptor locations in High Peak between the different data sources to demonstrate that they are all similar to predictions. Clarification was requested regarding the splitting up of the localised model validation zones, was the model set up checked / altered in each of the localised zones or is the only difference between the initial model run and the model zones being the splitting up of the model based on location and application of 6% emission factor gradient.</p> <p>The Applicant [REP5-022 paragraph 3.1.1] said that a meeting between the Applicant and High Peak Borough Council to discuss the matters raised by High Peak Borough Council is scheduled to take place in early March.</p> <p>The ExA notes the number of issues that appear to be unresolved and that the issues are potentially key to the air quality assessment. There is that there is little time remaining in the Examination for these matters to be addressed.</p> <p>c) Please could the Applicant and High Peak Borough Council discuss the issues further and seek to reach agreement?</p> <p>d) Please could the parties set out their respective positions by Deadline 6, and no later than Deadline 7, in advance of the Hearings scheduled for April 2022?</p>	<p>b) A virtual meeting was held between National Highways and HPBC on 4 March 2022 to discuss outstanding matters related to the air quality assessment methodology. Agreement was reached on:</p> <ol style="list-style-type: none"> 1. The approach to background concentrations 2. The use of localised model validation zones 3. EMP commitments in relation to construction dust monitoring 4. The impact of construction vehicle movements at sensitive receptors in HPBC 5. The impact of construction traffic management at sensitive receptors in HPBC <p>c) The following matters are still being discussed with HPBC with the aim of achieving agreement ahead of Deadline 7:</p> <ol style="list-style-type: none"> 1. The impact of modelling the gradient effect for gradients between 2.5% and 6%. 2. The use of multiple monitoring surveys in model verification. 3. The alternative routing of traffic in Glossop away from the A57 onto Shaw Lane and Dinting Road. <p>The consultation between National Highways and HPBC will be documented in a Statement of Common Ground to be submitted at Deadline 7.</p>

No	Question to	Reference	Question	National Highways' response
7. Air quality				
7.4	Applicant	Vehicles diverting to Shaw Lane and Dinting Road from A57 Glossop High Street	<p>High Peak Borough Council [REP4-011 Item 8.41] has questioned the rationale for showing vehicles diverting to Shaw Lane and Dinting Road from A57 Glossop High Street and whether this undermines the assessment of receptors on the A57. Peter Simon [REP4-026] suggested this would potentially affect flows through the Glossop Air Quality Management Area, which was screened out.</p> <p>Please could the Applicant respond and set out the implications for flows through the Glossop Air Quality Management Area if the diversion isn't taken? Are there any implications for the assessment of effects?</p>	<p>The traffic modelling used for the assessment of the Scheme provides the best indication of how future traffic demand will use the road network in response to changes in the operation of the modelled road network due to the Scheme compared to without it, whilst accounting for forecast traffic growth and other committed future modifications to the road network.</p> <p>For the routing of traffic across the modelled road network to significantly alter from that forecast by the traffic modelling, physical measures or schemes would need to be introduced onto the road network, such as changes in speed limits, traffic calming measures, additional traffic signals, etc., that would cause drivers to choose alternative competing routes. Any such proposed modifications to the road network would be subject to an impact assessment prior to their implementation that would need to consider the diversionary impact of the scheme on traffic and the consequential environmental effects. No such schemes for Dinting Road and Shaw Lane are proposed.</p> <p>Consequently, the forecast traffic flows across the modelled road network are considered to represent a reasonable and appropriate worst-case scenario of the traffic impacts of the Scheme through Glossop.</p> <p>If traffic was somehow prevented or discouraged from using Dinting Road and Shaw Lane, then additional traffic modelling would need to be undertaken to understand the likely traffic redistribution effects across the road network, which would not necessarily mean that traffic flows on any one alternative route, such as the A57 through Glossop (including Glossop AQMA), would increase. This is because there are likely to be wider, knock-on, traffic redistribution effects.</p>

No	Question to	Reference	Question	National Highways' response
7. Air quality				
7.5	Applicant Tameside Metropolitan Borough Council High Peak Borough Council Peak District National Park Authority	Screening	<p>The Applicant [REP4-008 Item 7dd and 7ee] has set out its approach to screening, the use of DMRB LA 105 guidance. It noted that lower thresholds are set out in Institute of Air Quality Management guidance, but that is specifically intended for residential and mixed used developments and highways schemes have their own set of criteria and thresholds to be used.</p> <p>a) Please could the Applicant provide the IAQM screening criteria, compare it with the DMRB LA 105 and provide reasoning why it considers that IAQM screening criteria are not appropriate? Is the Applicant suggesting that if the modelled increases in traffic levels are the same then the type of project that led to the increase in traffic would make a difference to the receptors?</p> <p>b) Would a variation of the screening threshold be appropriate for links within the Air Quality Management Areas?</p> <p>c) Please could Tameside Metropolitan Borough Council, High Peak Borough Council and Peak District National Park Authority comment?</p> <p>The ExA [EV-015 Item 7ee] asked the Applicant to comment on how the screening is consistent with the potential for a very small increase in Nitrogen Dioxide (NO₂) to result in non-compliance with the Air Quality Directive / Air Quality Standards Regulations 2010? The Applicant responded [REP4-008 Item 7ee]. The Applicant is predicting increases in traffic, which the ExA understands is likely to result in increases in NO₂ emissions.</p> <p>The ExA is concerned whether enough consideration has been given for those increases to result in a non-compliance, even if the increases in traffic are below 1,000 AADT. It is also concerned about the consideration given to receptors within Air Quality Management Areas designated for NO₂ that are just outside the study area.</p> <p>d) Please could the Applicant comment?</p> <p>e) Please could Tameside Metropolitan Borough Council, High Peak Borough Council and Peak District National Park Authority comment?</p>	<p>a) The traffic screening thresholds for changes in traffic flow requiring air quality assessment as set out within the Institute of Air Quality Management (IAQM) Land-Use Planning and Development Control: Planning for Air Quality (2017) guidance are as follows:</p> <ul style="list-style-type: none"> • a change in flows of light duty vehicles (LDV) of more than 500 annual average daily traffic (AADT) (or more than 100 AADT within or adjacent to an AQMA); or • a change in flows of heavy duty vehicles (HDV) of more than 100 AADT (or more than 25 AADT within or adjacent to an AQMA). <p>The traffic scoping criteria for changes in traffic flow requiring a quantitative air quality assessment as set out in the DMRB LA 105 are as follows:</p> <ul style="list-style-type: none"> • Road alignment will change by 5 m or more; or • Daily traffic flows (two way) will change by 1,000 annual average daily traffic (AADT) or more; or • Heavy Duty Vehicle (HDV) flows (two way) will change by 200 AADT or more; or • A change in speed band (for one way or two way traffic and in any time period (morning peak, interpeak, evening peak, off peak)). <p>The DMRB LA 105 provides thresholds applicable and suitable for the assessment of National Highways schemes which, as strategic interventions, impact traffic flows over a much wider area than residential and mixed used developments. This is also reflected in the difference in the nature and scale of the traffic models used for the assessment of highways schemes versus development schemes. For development schemes traffic data is typically only available for roads in the immediate vicinity of the development site. It is also clearly stated in the IAQM guidance that exceedance of the traffic screening thresholds does not automatically lead to the requirement for quantitative air quality assessment. The criteria provided in the IAQM guidance are precautionary and should be treated as indicative and should not be applied rigidly.</p> <p>The DMRB LA 105 traffic scoping criteria however provides traffic change criteria as absolute values which if exceeded require quantitative assessment, which for large projects with receptors within 50m of roads triggering the traffic scoping criteria must follow a detailed assessment approach using air dispersion modelling (as has been used in the Scheme air quality assessment).</p> <p>b) National Highways believes that the DMRB LA 105 traffic scoping criteria provides a robust and appropriate threshold for the assessment of significant effects on road links within AQMAs.</p> <p>c) National Highways has no comment to make.</p>

No	Question to	Reference	Question	National Highways' response
7.	Air quality			
				<p>d) National Highways response to question Item 7ee is provided in REP4-004, which provides National Highways response regarding compliance with the Air Quality Directive within the Tintwistle AQMA. National Highways gave a response regarding compliance with the Air Quality Directive within Glossop AQMA within the Scheme study area is provided in response to First Written Question 7.18 in Applicant's response to Examining Authority's First Written Questions (REP2-21). Further to the response to First Written Question 7.18 the A57 is included in the Defra Pollution Climate Mapping (PCM) model to both the north and south of the Dinting Vale Junction (A57 Junction with the A626 Glossop Road). The A57 south of Dinting Vale Junction is not within the air quality affected road network (ARN) and as such has not been considered further in the compliance risk assessment as there is not an overlap between the PCM model road link and the ARN for the Scheme.</p> <p>Where there is an overlap between the ARN and the PCM model to the north the compliance risk assessment modelling results (e.g. receptors QF601, PA179, PA24 and QF602) indicate that while there is a worsening with the Scheme, under the Defra LAQM.TG(16) method there would not be an exceedance of an Air Quality Strategy (AQS) objective/Limit Value, with annual mean NO₂ concentrations with the Scheme below 36 µg/m³, and as such there would not be a risk of non-compliance with the Air Quality Directive. This is also true for the PCM model validation points located at 4 metres from the A57 road edge at Dinting Vale Junction (See data for PCM link ID 802077828 provided in Table A-5 ES Appendix 5.5 [APP-159])). This is for a location within the ARN where the traffic DMRB LA 105 traffic change criteria are exceeded, so by extension for the section of the Glossop AQMA which is not within the ARN there would also not be a non-compliance with the Air Quality Directive. Given that under the Defra LAQM.TG(16) method annual mean NO₂ concentrations at all modelled receptors within or adjacent to Glossop AQMA are well below the AQS objective/Limit Value there is not considered to be a risk of non-compliance within the AQMA just outside the air quality study area.</p> <p>e) National Highways has no comment to make.</p>
7.6	Applicant	Construction traffic	<p>High Peak Borough Council [REP4-011 Items 8.35 and 8.36] request information on the level of construction traffic and duration for the eastern end of the link road where it connects at Woolley Bridge due to air quality receptors being within 200m. They further request clarification on whether construction traffic and management are likely to result in an adverse effect on congestion in High Peak. Please could the Applicant respond?</p>	<p>National Highways response to item 8.36 regarding both construction vehicle movements and construction traffic management is provided in Comments on Local Impact Report submitted by Derbyshire County Council and High Peak Borough Council (REP3-018).</p> <p>There are not anticipated to be any construction vehicle movements on the public highways in HPBC. When travelling off site, construction traffic is expected to travel west from the Scheme extent on public highways towards Manchester. Most construction vehicle movements on site are expected to follow the trace of the scheme alignment with a maximum of 89 daily 2-way HDV on-site movements. Assuming the worst case, that all these vehicles travel to the far eastern edge of the trace alignment, where the link road</p>

No	Question to	Reference	Question	National Highways' response
7.	Air quality			
				<p>connects with the existing A57 and the closest location to properties in HPBC, the number of daily HDV movements would not meet the DMRB LA 105 traffic scoping criteria requiring further assessment.</p> <p>With respect to construction traffic management, construction phase 2 and 3 (both of 6-month duration) are expected to have the largest impact on traffic on the local highway network. The maximum AADT change on any road within HPBC as a result of traffic management measures across either phase is expected to be 144 AADT on A57 Woolley Lane and 20 HDV on the A628 Manchester Road. The traffic change does not therefore meet the DMRB LA 105 traffic scoping criteria requiring further assessment.</p> <p>The approach to the assessment of construction vehicle emissions and the impact of construction traffic management has been further discussed and agreed with HPBC (meeting held 4 March 2022).</p> <p>The temporary traffic management measures will generally be short term, with the arrangements, timing and phasing being designed to minimise traffic congestion and delay far as reasonably practicable. Inevitably, however, some of the temporary traffic management arrangements are likely to cause some additional short term traffic congestion and delay within the immediate vicinity of the Scheme, but this is not anticipated to be sufficient to result in any material change in traffic flows or congestion on roads within HPBC.</p>
7.7	High Peak Borough Council	Air Quality Management Areas NPSNN paragraph 5.11	<p>The Applicant [REP2-021 Q7.15 to 7.18 and REP4-008 Items 7dd to 7jj] responded to questions regarding its assessment of effects on Air Quality Management Areas.</p> <p>a) Please could High Peak Borough Council comment?</p> <p>b) Does High Peak Borough Council have any remaining concerns about the consideration given to air quality</p> <ul style="list-style-type: none"> • Within or adjacent to Air Quality Management Areas? • Where changes are sufficient to bring about the need for a new Air Quality Management Area or change the size of an existing Air Quality Management Area; or bring about changes to exceedances of the Limit Values? 	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
7. Air quality				
7.8	High Peak Borough Council	Air Quality Directive / Air Quality Standards Regulations 2010 NPSNN paragraph 5.13	The Applicant [REP4-008 Items 7ee and 7hh] said that there would not be a non-compliance with the Air Quality Directive in the vicinity of Tintwistle or Dinting Vale / Glossop. a) Please could High Peak Borough Council comment? b) Does High Peak Borough Council have any remaining concerns about: <ul style="list-style-type: none"> Whether the Proposed Development would result in any area which is currently reported as being compliant with the Air Quality Directive becoming non-compliant? Whether the Proposed Development would affect the ability of any non-compliant area to achieve compliance within the most recent reported timescales? 	National Highways has no comments to make.
Remaining concerns				
7.9	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of air quality?	National Highways has no comments to make.
7.10	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of air quality?	National Highways has no comments to make.
7.11	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of air quality?	National Highways has no comments to make.

9. Climate change

No	Question to	Reference	Question	National Highways' response
8.	Climate change			
	Overall assessment methodology			
8.1	Applicant	Indirect effects	<p>Please could the Applicant comment on the relevance of the following recent judgement to the consideration of indirect effects from the Proposed Development:</p> <ul style="list-style-type: none"> R (on the application of Sarah Finch on behalf of Weald Action Group) v Surrey County Council, Horse Hill Developments Ltd, SoS LUHC v Friends of the Earth Ltd [2022] EWCA 187? 	<p>The Applicant is familiar with the <i>Finch</i> case and noted that whilst it was concerned with the indirect effects for crude oil extraction, it cited and affirmed the established case law in relation to the assessment of effects for road schemes which should consider the construction and operation phases. The Applicant has assessed the likely significant effects of the construction and operation of the A57 Link Road in the Environmental Statement and this approach is consistent with <i>Finch</i> and the earlier established case law.</p>
8.2	Local authorities	Cumulative effects	<p>In Issue Specific Hearing 2 [EV-015] Item 6c] the ExA requested that the Applicant provide its assessment of the cumulative effects of Greenhouse Gas emissions from the Proposed Development with other existing and / or approved projects on a local, regional and national level on a consistent geographical scale (for example an assessment of the cumulative effects of the Road Investment Strategy (RIS) 1 and RIS 2 at a national level). The Applicant [REP5-026] responded at Deadline 5.</p> <p>Please could the local authorities comment on the Applicant's response? Has appropriate consideration been given to local policies and local or regional carbon budgets?</p>	<p>National Highways has no comments to make.</p>
8.3	Applicant	Significant effects - threshold	<p>The Applicant [REP4-008] Item 6e] said that NPSNN does not set out the criteria for what should be considered significant, but instead it sets out the criteria for when carbon emissions should be a reason for refusal. It also said that "<i>Section 3 of DMRB LA 114, paragraphs 3.18 to 3.20 define the reporting requirements for comparison against the relevant carbon budgets and the evaluation criteria for significance, which is consistent with the decision-making requirements set out in paragraphs 5.17 and 5.18 of the NPSNN.</i>"</p> <p>a) Given that the Applicant considers that the NPSNN does not set out the criteria for what should be considered significant, please could it explain why it considers that the DMRB LA 114 evaluation criteria for significance is consistent with the NPSNN?</p> <p>b) Please could the Applicant comment on whether it is appropriate for the threshold for refusal established in national policy to be adopted for the assessment of significant effects? Is there any other precedent in national policy for the criteria for refusal and significance to be the same? Is it reasonable to expect the</p>	<p>a) DMRB LA 114 does not set out specific significance thresholds or criteria. It is consistent with NPSNN because they both refer to a significant effect being one where a scheme would materially impact on the UK's ability to meet carbon reduction targets. The difference is that NPSNN states that an increase in GHG emissions is not a reason to refuse development consent unless the effect is material, whereas DMRB LA 114 states that significant effects should only be reported if the effect is material. The DMRB LA 114 methodology requires predicted GHG emissions to be reported against UK government carbon budgets, but thresholds to determine what GHG levels are significant, in EIA terms, are absent. Note 1 of DMRB LA 114 states: <i>National policy states that "It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets".</i> Note 2 then states: <i>In the context of NOTE 1, it is considered unlikely that projects will in isolation conclude significant effects on climate.</i> Furthermore, it advises that, where the assessment conclusions indicate that a material impact is likely, it should be supported with evidence. Using professional judgement, and in the absence of any recognised thresholds or defined significance criteria, there was no evidence to support a conclusion that the</p>

No	Question to	Reference	Question	National Highways' response
8.	Climate change		<p>threshold for the assessment of significant effects to be lower than that used for refusal?</p> <p>The IEMA¹ has published updated guidance on the assessment of greenhouse gas emissions, which includes some further guidance about how to establish significance.</p> <p>c) Please could the Applicant comment on how significance is defined in that context?</p>	<p>Scheme would result in a significant impact based on comparison with other schemes of a similar size and nature.</p> <p>The GHG emissions during the construction stage were not considered to be significant because embedded mitigation measures will ensure that emissions are not unnecessarily high (see National Highways response to ExA First Written Questions Q8.7 and Q8.8 (REP2-021)).</p> <p>The magnitude in change in GHG emissions during the operational phase was not considered to be significant because, as shown in Table 14.16 of Chapter 14 of the ES (REP01-019), the overall (net) residual effect was no more than 0.0033% against any of the UK carbon budgets. For the updated values that have been reported using the latest road user emissions (Emission Factor Toolkit v11) (REP5-026) this overall (net) residual effect is reduced (see response to 8.3c below).</p> <p>b) It was held in the case of R (Transport Action Network Limited) v Secretary of State for Transport and Highways England Company Limited (2021) EWHC 2095 (Admin) that in relation to the judgment reached regarding the entirety of the carbon emissions from all schemes within RIS 2: “I see no reason to question the judgment reached by the DfT that the various measures of carbon emissions from RIS2 were legally insignificant, or <i>de minimis</i>, when related to appropriate comparators for assessing the effect on climate change objectives.” (paragraph 159). Since that is the conclusion reached in relation to all schemes within Roads Investment Strategy (RIS) 2, the Scheme is a small part of an overall programme which is <i>de minimis</i> in terms of its impact upon carbon reduction commitments. The NPSNN states that generation of emissions is not in of itself a reason to refuse development consent (paragraph 5.18), particularly when the magnitude of these emissions is small in comparison with the reductions which will be generated by improvements such as electrification of the fleet. Please also refer to the Applicant’s response to Issue Hearing 2 Item 6 c) and d) (REP5-026) for details on the consideration of likely significant effects. .</p> <p>The Applicant is not aware of any other precedent in national policy for the criteria for refusal and significance to be the same.</p> <p>c) In the updated IEMA guidance mitigation takes a more prominent role, from the outset of the EIA process and throughout the project’s lifetime. For the Scheme, this is demonstrated through the mitigation measures that are in Chapter 14 of the ES and also, more recently, the Outline Carbon Management Plan (CMP) (REP5-023). The Scheme is already aligned with the IEMA guidance as GHG reduction opportunities have been addressed in close cooperation with the project team. The IEMA guidance presents a GHG management hierarchy (eliminate, reduce, substitute and compensate) to</p>

¹ IEMA, Assessing Greenhouse Gas Emissions and Evaluating their Significance, 2nd edition (February 2022)

No	Question to	Reference	Question	National Highways' response
8.	Climate change			<p>compensate residual emissions that is a similar structure to that of PAS 2080. The GHG emissions assessment methodology is also well aligned with DMRB LA 114.</p> <p>The guidance presents a more nuanced approach to significance by setting out the relative contribution of a project towards a science-based 1.5°C aligned transition to net zero. This can be applied to the net GHG emission effect that is reported in Chapter 14 of the ES. In the guidance, the position is that all GHG emissions contribute to climate change, however it now provides relative significance descriptions to assist assessments and deliver a more proportionate EIA.</p> <p>The significance of the Scheme's emissions should be based on its net impact over its lifetime, which may be positive, negative, or negligible. In this case the impact of the Scheme is negative.</p> <p>Where GHG emissions cannot be avoided, the goal of the EIA process should be to reduce the project's residual emissions at all stages.</p> <p>The guidance states: '<i>The crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050</i>'. In doing so, it is important to consider the net zero trajectory in line with the Paris Agreement's 1.5°C pathway.</p> <p>Using the GHG emission values that have been reported in Table 1 of the Applicant's response to Issue Hearing 2 Item 6 c) and d) (REP5-026), the Scheme is likely to contribute 107,700 tCO₂e to the UK's Carbon Budgets across the period 2023-37, compared with the Do-Minimum scenario.</p> <p>The (net) contribution of the Scheme to the Fourth Carbon Budget period would be 55,400 tCO₂e (equivalent to 0.0028% of that budget), including construction and operational phase emissions. The contribution of the Scheme to the Fifth Carbon Budget would be 26,400 tCO₂e (equivalent to 0.0015% of that budget), from operational emissions. The contribution of the Scheme to the Sixth Carbon Budget would be 25,900 tCO₂e (equivalent to 0.0027% of that budget). The GHG emissions would not have a material impact on the Government meeting its carbon reduction targets.</p> <p>The IEMA guidance provides examples of how to distinguish different levels of significance. These range as follows:</p> <p><i>Beneficial</i> - the project's net GHG impacts are below zero</p> <p><i>Negligible</i> - the project's GHG impacts would be reduced through measures that go well beyond existing and emerging policy and design standards for projects of this type</p> <p><i>Minor adverse</i> – the project's GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards for projects of this type</p> <p><i>Moderate adverse</i> – the project's GHG impacts are partially mitigated and may partially meet the applicable existing and emerging policy requirements</p>

No	Question to	Reference	Question	National Highways' response
8.	Climate change			
				<p><i>Major adverse</i> – the project's GHG impacts are not mitigated or are only compliant with do-minimum standards set through regulation</p> <p>Given the mitigation measures that have been incorporated into the Scheme (which are secured through the REAC), and the conclusion that the Scheme would not result in a material impact on the Government meeting its carbon reduction targets, for the purposes of the EIA, the Scheme is assessed as having a minor adverse residual effect when using the IEMA significance criteria.</p> <p>It should be noted that the construction phase GHG emissions used in this assessment are likely to be an overestimation as it considers the unmitigated Scheme (i.e. before the carbon management process is implemented). This is because the input data used in the carbon emissions calculation tool was for standard materials and construction methods. These methods and quantities will change as the CMP is applied during the Detailed Design stage. The detailed CMP, and the reporting that will accompany it, will quantify GHG emission savings against the stated baseline.</p>
8.4	Derbyshire County Council Applicant	Significant effects - benchmarking	<p>Derbyshire County Council [REP4-010] Item 6f] suggested that benchmarking should be undertaken in accordance with DMRB LA 114 to help establish level of significance. The Applicant [REP4-008] Item 6f] referred to the benchmarking of the operational stage provided in paragraph 14.3.14 of ES Chapter 14 Climate [REP1-019].</p> <p>a) Does Derbyshire County Council have any comments on the Applicant's response? Is it satisfied that paragraph 3.21 of DMRB LA 114 has been followed?</p> <p>b) Please could the Applicant set out whether it has carried out any benchmarking of carbon emissions for the construction phase, including from materials. If it has, how was the data normalised? Did the projects benchmarked against include any use of carbon reduction methods, such as the use of any low carbon construction methods or materials?</p>	<p>a) No response required</p> <p>b) Benchmarking is not a requirement for calculating embedded carbon emissions. The assessment used National Highways' carbon emissions calculation tool which uses lifecycle carbon emissions factors drawn from comprehensive sources such as the Inventory of Carbon and Energy and government carbon emission factors.</p>
8.5	Local authorities Interested Parties	Significant effects - de minimis	<p>The Applicant [REP2-021] Q8.1d and [REP4-008] Item 6g] refers to the case of R (Transport Action Network Limited) v Secretary of State for Transport and Highways England Company Limited (2021) EWHC 2095 (Admin). The Applicant suggests that the carbon emissions from the Proposed Development should not be considered significant if the assessment is to be consistent with that judgement.</p> <p>Please could the local authorities and Interested Parties comment?</p>	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
8.	Climate change			
	Construction materials, transport, and construction processes			
8.6	Local authorities Applicant	Mitigation measures	<p>The ExA is considering whether mitigation is firmly secured and therefore the extent to which it can be relied on. It is considering if it is necessary to add a Requirement to the dDCO [REP5-006].</p> <p>The Applicant has updated the Register of Environmental Actions and Commitments [REP5-012 C1.8] and provided an Outline Carbon Management Plan [REP5-023] which sets out the proposed use of Carbon Management in Infrastructure, published by BSI (PAS 2080).</p> <p>Derbyshire County Council [REP4-010 Items 6l and 6m] said that PAS 2080 should be included as a mitigation measure and independent verification of its use assured. It noted that PAS 2080 helps to guide mitigation measures but does not specifically identify them and so a detailed assessment of the impacts and measures to mitigate them is still needed, with PAS 2080 used as the overarching framework. It suggested that an outline strategy for the use of PAS 2080 should be developed and agreed during the Examination, in order to ensure the appropriate approach, language and framework is being applied.</p> <p>a) Please could the local authorities comment on the updated Register of Environmental Actions and Commitments [REP5-012 C1.8] and on the Outline Carbon Management Plan [REP5-023]?</p> <p>b) Please could the Applicant respond to Derbyshire County Council's comments?</p> <p>c) Please could the Applicant clarify whether the Outline Carbon Management Plan will be appended to the first iteration EMP [REP3-010 REP5-012]? If not, how will it be certified for the dDCO?</p> <p>d) Should firm mitigation measures, such as the use of specific low carbon construction methods or materials, be identified? Should targets for reduction be set against the emissions which assume the use of conventional construction methods and materials in the ES Chapter 14 Climate [REP1-019]? Should measures be added to require independent review of the use of the process and the mitigation that is identified? Should there be independent verification that the mitigation is delivered? What role should the local authorities have?</p>	<p>a) No response required.</p> <p>b) The Outline CMP (REP5-023) provides the project specific strategy and details for implementing PAS 2080, covering approach, language, framework and specific processes.</p> <p>c) The Outline CMP (REP5-023) was submitted as a standalone document at Deadline 5, however the Applicant will update the EMP (First iteration) for Deadline 9 with the Outline CMP in Annex B so that it can be certified for the dDCO.</p> <p>d-i) Firm measures such as use of specific low carbon construction methods or materials should not be identified as this is considered to presuppose and restrict options. The combination of applying PAS 2080, the carbon reduction hierarchy, and having a carbon reduction target provides the mechanisms to ensure that carbon reduction measures appropriate to the Scheme are implemented.</p> <p>d-ii) The reduction target will be set in accordance with the latest National Highways Net Zero Plan. Further, in accordance with PAS 2080, the targets are set against the baseline model. This does not assume the use of conventional construction methods and materials, rather the current standard methods and materials, most of which could be considered conventional.</p> <p>d-iii) Review of the process and the mitigation used is considered to be effectively provided through the existing engineering review process and the PAS 2080 self-validation. As a consequence, independent review is not considered to be required. If any independent review is considered to be required, this would have to be as part of a wider engineering and procurement review, as these must be directly taken into consideration when reviewing the carbon reduction mitigations.</p> <p>d-iv) Independent verification that the mitigations are implemented is considered to be included in the overall engineering verification and the PAS 2080 self-validation. As a consequence, independent verification is not considered to be required. If any independent verification is considered to be required, this would have to be as part of a wider construction verification, as this must be directly taken into consideration when verifying implementation of the carbon reduction mitigations.</p> <p>d-v) The local authorities should integrate carbon reduction oversight into any other engineering oversight role that they currently carry out.</p>

No	Question to	Reference	Question	National Highways' response
8. Climate change				
8.7	Applicant	Use of PAS 2080: 2016	<p>The Applicant [REP4-008 Item 6m] said that it did not propose to mandate PAS 2080 across all parties. The ExA's understanding is that wide participation is required for PAS 2080 to be effective.</p> <p>Please could the Applicant clarify which parties should be required to use PAS 2080? How should that be secured?</p>	<p>On the A57 Link Roads Scheme the Principal Contractor has committed to adhering to the principles of PAS 2080. However National Highways is still developing its approach to PAS 2080. The Outline CMP requires commitment from all project stakeholders, and therefore achieving the buy in from all parties is a vital step in the carbon management process. For example, all value chain engagements are required to raise carbon performance as a metric for consideration as part of design development and construction planning, and carbon will be integrated into the procurement process. Additionally, there are clearly defined roles and responsibilities to embed carbon management across all parties' activities, including responsibilities for the Supply Chain Manager to ensure all operations meet carbon targets and to collaborate with all vendors and suppliers to ensure carbon procurement is integrated.</p> <p>The key parties most relevant to use of PAS 2080 are the appointed Principal Designer and Contractor. These parties are both included within the CMP commitments, and this is considered to be the correct mechanism to secure implementation.</p> <p>As set out in response to written question 8.6 (c) this commitment will be set out in the Carbon Management Plan which will be secured as part of the Second Iteration Environmental Management Plan under Requirement 4.</p>
Operational phase				
8.8	Applicant Derbyshire County Council	Mitigation measures	<p>Derbyshire County Council [REP2-051 Q8.14 and REP4-010 Item 6o] has suggested carbon-reduction measures for the operational phase. The Applicant [REP3-021 page 16] responded to the initial suggestions.</p> <p>Please could the Applicant and Derbyshire County Council discuss the measures, seek to agree the mitigation, and confirm which matters have been agreed or not agreed?</p>	<p>The mitigation measures that are within the control of the Applicant are already embedded into the design. The Applicant has highlighted where measures can and cannot be secured. A summary of DCC's suggested carbon-reduction measures for the operational phase (in bold below) and our previous responses to each of these is:</p> <p>Creating a network of cycleways and footways that would encourage active travel and reduce the reliance on vehicle use</p> <p><i>(From National Highways' response to question 8.14 in the Examining Authority's First Written Questions REP2-021)</i></p> <ul style="list-style-type: none"> • This would be achieved through increasing the use of other transport modes: <ul style="list-style-type: none"> ○ The Scheme will provide new and improved facilities for pedestrians, cyclists and horse riders throughout the route, including: ○ Improved pedestrian and cyclist crossing facilities at the M67 junction 4, and all new junctions created by the scheme ○ Crossing at the Mottram Moor junction will now be quicker and easier with the new crossroads design. We're also adding more cycling and pedestrian crossings ○ Replacement connections for the existing footpaths severed by the scheme ○ A combined footway and cycleway along the new A57 Link Road between Mottram Moor and Woolley Bridge, creating a route to link Mottram to the Trans-Pennine Trail (National Cycle Network route 62)

No	Question to	Reference	Question	National Highways' response
8.	Climate change			<ul style="list-style-type: none"> ○ The Applicant is continuing to work with Local Authorities to improve connections on the existing A57 route ○ The Scheme is also expected to help public transport to be more reliable where it currently gets delayed, making its use a more attractive option to the public ○ The main pathway element recommended by the Committee on Climate Change (CCC) for transport and transport infrastructure is electrification of the national fleet. This will require a fit-for-purpose road network with adequate capacity. The CCC's 'core' and 'further ambition' scenarios both include an element of modal shift to non-road transport. However, road transport remains the central focus of policy and will continue to require appropriate infrastructure. <p>Mitigation agreed/confirmed by National Highways: Yes – the full suite of measures listed above will be delivered as part of the Scheme can be secured to encourage active travel.</p> <p>Potential for renewable energy installations and generation</p> <p><i>(From the National Highways' response [REP3-021 page 16] to Derbyshire County Council at Deadline 3)</i></p> <ul style="list-style-type: none"> • It is National Highways position that the private sector will provide EV charging across the network. It is therefore not within the scope of individual projects to deliver infrastructure. National Highways are supporting the UK's rapid transition to EVs through implementing their 'Net Zero Highways Plan'. <p>Mitigation agreed/confirmed by National Highways: No – National Highways will not provide EV charging points as part of this Scheme</p> <p>Opportunities for habitat creation and protection in relation to offsetting and resilience</p> <p><i>(From National Highways' response to question 8.14 in the Examining Authority's First Written Questions REP2-021)</i></p> <ul style="list-style-type: none"> • The DMRB LA114 states that 'A proportionate approach shall be applied to calculating and reporting GHG emissions from changes in land use and forestry (i.e. reporting only where there is likely to be a substantial change).' Depending on the type of vegetation and landscaping around the Scheme, the land itself may emit or sequester greenhouse gases. The sizes of planted areas within the DCO boundary have been increased, which will lead to increased removal and sequestration of GHGs from the atmosphere. However, it is not considered that this element will have a significant impact on overall Scheme emissions and has not been quantified in this assessment. Professional judgment was used over quantification in Chapter 14: Climate insofar as it relates to land use change. The DMRB guidance in LA 114 prescribes that a proportionate approach should be

No	Question to	Reference	Question	National Highways' response
8.	Climate change			
				<p>taken to this area of the assessment, and our professional judgment was taken according to this proportionate approach. It should be noted as stated in the ES, Chapter 8: Biodiversity, the existing land use is largely improved grassland, with limited inherent carbon stocks and limited sequestration potential; the Scheme will focus on maximising biodiversity delivery, targeting a net increase of 5.35ha of lowland mixed deciduous woodland which would provide an increased rate of sequestration against the existing baseline of improved grassland.</p> <p>Mitigation agreed/confirmed by National Highways: Yes – maximising biodiversity to increase habitat creation can be secured. This will include a net increase of woodland</p> <p>Behavioural change and cooperation between local authorities, residents and businesses to reduce carbon emissions</p> <p><i>(From National Highways' response to question 8.14 in the Examining Authority's First Written Questions REP2-021)</i></p> <ul style="list-style-type: none"> Behavioural changes are anticipated due to improved social cohesion as the Scheme makes considerable provisions for walkers, cyclists and horse riders. During operation the Scheme would reduce community severance through the separation of local and regional traffic resulting in large reductions of traffic on the existing A57. This presents the opportunity to make this stretch of road much more friendly to cyclists and pedestrians (across all groups) through improved facilities and crossings, public realm improvements and reduction in speed. Traffic congestion issues will be alleviated with significant reductions in traffic predicted at Mottram Moor (between Back Moor and Stalybridge Road, Hyde Road and Woolley Lane), therefore providing a safer and more pedestrian friendly environment in the village. <p>Mitigation agreed/confirmed by National Highways: Yes – the full suite of measures listed above will be delivered as part of the Scheme can be secured to encourage behavioural changes</p> <p>On this basis, all of DCC's measures can be agreed with one exception, and that is 'Potential for renewable energy installations and generation'.</p>
Remaining concerns				
8.9	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of climate change?	National Highways has no comments to make.
8.10	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
8.	Climate change			
			remaining concerns that it has about the Applicant's consideration of climate change?	
8.11	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of climate change?	National Highways has no comments to make.
8.12	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of climate change?	National Highways has no comments to make.

10. Historic environment

No	Question to	Reference	Question	National Highways' response
9. Historic environment				
Policy and methodology				
9.1	Applicant Local authorities	Non-designated heritage assets for which the Applicant is unable to identify the significance of effect	<p>The Applicant [REP2-021 Q6.3] said that it was confident that the assets would be characterised at a future stage and that the residual effects would be unlikely to exceed slight adverse and would therefore not be significant.</p> <p>Is the Applicant able to secure a firm undertaking that the assets would be characterised at a future stage?</p> <p>Do the local authorities have any comments on the Applicant's approach or on the Applicant's advice that the significant effects would be unlikely to be significant?</p>	<p>The commitment to determine the location and extent of any required archaeological works is set out under CH1.1 of the REAC (REP5-012). This provides a secure undertaking for the delivery of a staged programme of archaeological works which will include characterisation of the non-designated assets for which we have been unable to determine significance.</p> <p>This is further supported by CH 1.4 of the REAC (CH1.4) which states that the Written Scheme of Investigation will be refined in conjunction with the Archaeological Fieldwork Strategy. This will include contingency for hitherto unidentified archaeological remains, including those assets that are yet to be characterised.</p> <p>There will be a contractual arrangement for these currently uncharacterised assets to be investigated at a future stage between The Applicant and the Appointed Principal Contractor under the DCO Requirements 10(1) and 10(4).</p>
9.2	Tameside Metropolitan Borough Council High Peak Borough Council Applicant	Limited harm and the NPPF tests	<p>Tameside Metropolitan Borough Council [REP2-056 Q6.4] and High Peak Borough Council [REP2-053 Q6.4] raised concerns about the Applicant's use of the term "<i>limited harm</i>" and the whether the NPPF tests have been addressed correctly.</p> <p>The Applicant [REP2-021 Q6.3 and REP3-021 pages 15, 28 and 59] said that "<i>limited harm</i>" [REP1-015 Table 6-3] is considered to fall at the lower end of the spectrum of less than substantial harm.</p> <p>Do Tameside Metropolitan Borough Council or High Peak Borough Council have any remaining concerns about the definition of "<i>limited harm</i>" or whether the NPPF tests have been addressed correctly?</p> <p>Please could the Applicant update the ES to include the explanation and clarify how the NPPF tests have been addressed?</p>	National Highways has submitted a revised version of the Environmental Statement Chapter 6 at Deadline 6 in response to this question.
9.3	Local authorities Peak District National Park Authority Applicant	Magnitude of adverse effects equivalence to level of harm and the NPPF tests	<p>The Applicant [REP2-021 Q6.5] said that "<i>major adverse magnitude of impact</i>" [REP1-015 Table 6-3] equates to substantial harm, while lesser magnitudes of impact equate to less than substantial harm.</p> <p>Do the local authorities or Peak District National Park Authority have any concerns about the equivalence of magnitude of adverse effect to level of harm or whether the NPPF tests have been addressed correctly?</p> <p>Please could the Applicant update the ES to include the explanation and clarify how the NPPF tests have been addressed?</p>	National Highways has submitted a revised version of the Environmental Statement Chapter 6 at Deadline 6 in response to this question.

No	Question to	Reference	Question	National Highways' response
9. Historic environment				
Designated heritage assets				
9.4	Local authorities	Melandra Castle Roman Fort	<p>The Applicant [REP3-018 pages 26 and 27] responded to concerns raised by Derbyshire County Council [REP2-045 Paragraphs 9.19 to 9.22] about the consideration given to the setting of Melandra Castle Roman Fort, how much harm would be done to it, and the mitigation of long term impacts.</p> <p>Does Derbyshire County Council have any remaining concerns about the assessment, the level of harm, or about the secured mitigation measures?</p> <p>Have the local authorities identified other mitigation measures that they consider should be provided and, if so, what is the justification them to be secured?</p>	National Highways has no comments to make.
9.5	Tameside Metropolitan Borough Council	Mottram Old Hall Contribution of parklands to significance of asset	<p>The Applicant [REP3-021 page 60] responded to Tameside Metropolitan Borough Council's request [REP2-056 Q6.7] for clarification of the extent of "former grounds" and "parkland" considered in the assessment.</p> <p>Does Tameside Metropolitan Borough Council have any remaining concerns about the assessment or about the Applicant's conclusion that there would be less than substantial harm on Mottram Old Hall?</p>	National Highways has no comments to make.
9.6	Peak District National Park Authority	Tintwistle Conservation Area Ladybower Reservoir The scheduled monuments Hordron Edge, Bamford Edge, Crook Hill, and Bridgend Pasture	<p>The Applicant [REP2-021 Q6.8] has set out its consideration of impacts on Tintwistle Conservation area and the listed buildings and scheduled monuments identified by Peak District National Park Authority in their Local Impact Report [REP2-048 paragraphs 8.4.5 and 8.4.7].</p> <p>Does Peak District National Park Authority have any remaining concerns about the Applicant's conclusions?</p>	National Highways has no comments to make.
9.7	Applicant	Opportunities to deliver enhancement of the historic environment	<p>Paragraph 5.137 of the NPSNN notes that Applicants should look for opportunities within Conservation Areas and within the settings of heritage assets to enhance or better reveal their significance.</p> <p>Peak District National Park Authority [REP2-048 Paragraph 8.4.10 and REP2-055 Q6.8] have commented on the lack of enhancement. The Applicant [REP3-028 page 51] said that it was pursuing</p>	Funding has been secured through National Highways' Environment and Wellbeing Designated Funds (EWDF) for two feasibility studies for the enhancement of the Mottram-in-Longdendale Conservation Area and the Melandra Castle Scheduled Monument. EWDF are awarded by National Highways and are wholly separate from the DCO process. The projects that the feasibility studies are considering are enhancement opportunities that will be subject to successful applications EWDF funding, and are not for the provision of the

No	Question to	Reference	Question	National Highways' response
9.	Historic environment			
		NPSNN Paragraph 5.137	opportunities to deliver enhancement through the National Highways Designated Funds programme. Please could the Applicant provide evidence that enhancement opportunities are being considered for the Conservation Areas and heritage assets identified in ES Chapter 6 [REP1-015] ?	<p>mitigation measures that are recommended in the ES. Designated Funds cannot be used for the provision of Scheme mitigation.</p> <p><u>Mottram-in-Longdendale Conservation Area</u></p> <p>The feasibility study will explore opportunities to deliver enhancements to the conservation area following the de-trunking of the A57 at this location. Opportunities for enhancing the character and appearance of the conservation area will be explored, and these may include:</p> <ul style="list-style-type: none"> • Hard and soft landscaping • Enhancement of boundaries • Enhancement of building frontages <p>The purpose of the feasibility study will be to identify those measures which are deliverable and sustainable in the long term. The measures identified in the feasibility report will be agreed with Tameside Metropolitan Borough Council.</p> <p><u>Melandra Castle Scheduled Monument</u></p> <p>A Conservation Management Plan was prepared for Melandra Castle in 2013. As part of the feasibility study, the Conservation Management Plan will be updated and will comprise:</p> <ul style="list-style-type: none"> • Setting up a working group for Melandra Castle comprising representatives from Historic England, High Peak Borough Council, Derbyshire County Council, Glossop and Longdendale Archaeological Society and Atkins. The first meeting of the working group is expected to take place in late March 2022. • Updating the 2013 Conservation Management Plan • Undertaking an audit of the archaeological archives for Melandra Castle • Undertaking a site visit with the working group and specialists • Preparing an interpretation option strategy • Updating ecological survey • Outline condition survey <p>The aim of the updated Conservation Management Plan is to help to retain the significance of Melandra Castle through a programme of management, conservation and interpretation, and to start the process of consolidating the archaeological archive. Further works to consolidate and preserve the fabric of Melandra Castle will be identified as part of the Conservation Management Plan and pursued through subsequent applications to the EWDF.</p>
Remaining concerns				
9.8	Tameside Metropolitan	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
9.	Historic environment			
	Borough Council		summarise any remaining concerns that it has about the Applicant's consideration of the historic environment?	
9.9	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of the historic environment?	National Highways has no comments to make.
9.10	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of the historic environment?	National Highways has no comments to make.
9.11	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of the historic environment?	National Highways has no comments to make.

11. Soil, ground conditions, material assets and waste

No	Question to	Reference	Question	National Highways' response
10.	Soil, ground condition, material assets and waste			
	Earthworks			
10.1	Applicant	Supplementary ground investigation	The Applicant has indicated that further ground investigation would be carried out in February 2021. Please can the Applicant provide an update on the future availability of the results of the 2021 supplementary ground investigation, and any consequent updates to the ES?	The Applicant will be in a position to submit the Ground Investigation Report for the 2021 supplementary ground investigation at Deadline 7. The relevant sections of the ES will be updated to acknowledge and cross reference this submission.
	Remaining concerns			
10.2	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of soils, ground conditions, material assets or waste?	National Highways has no comments to make.
10.3	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of soils, ground conditions, material assets or waste?	National Highways has no comments to make.
10.4	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of soils, ground conditions, material assets or waste?	National Highways has no comments to make.
10.5	Peak District National Park Authority	Remaining Concerns	Apart the issues covered elsewhere in these second written questions, please could Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of soils, ground conditions, material assets or waste?	National Highways has no comments to make.
10.6	Environment Agency	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Environment Agency summarise any remaining concerns that it has about the Applicant's consideration of soils, ground conditions, material assets or waste?	National Highways has no comments to make.

12. The water environment, drainage, flood risk assessment, Water Frameworks Directive

No	Question to	Reference	Question	National Highways' response
11.	The water environment, drainage, flood risk assessment, Water Frameworks Directive			
	Baseline information			
11.1	Applicant	National Highways Deadline 5 Submission - Flood Risk Assessment (Tracked) [REP5-019]	<p>The Applicant has submitted a Flood Risk Assessment document at Deadline 5 [REP5-019] which is identified as a “tracked” document. No alterations appear to be identified in the document and it appears identical to the Flood Risk Assessment submitted at Deadline 5 [REP5-010].</p> <p>Has the document marked as being a “tracked” document been submitted in error?</p>	National Highways has resubmitted the tracked version of the Flood Risk Assessment at Deadline 5 which displays the changes (REP5-019). The tracked changes show that paragraph 4.5.9, footnotes 16 and 17 were added to the document and the title of Insert 4-6 has been updated.
11.2	Applicant	<p>Environment Agency's representation at Deadline 4 [REP4-019]</p> <p>National Highways Response to Representations made at Deadline 4 [REP5-022]</p> <p>River Etherow modelling</p>	<p>It is noted that the modelling of the River Etherow has not yet been agreed with the Environment Agency. The Applicant has responded to the concerns of the Environment Agency [REP5-022] stating the intention to address this matter at Detailed Design Stage.</p> <p>a) How can the ExA be satisfied that a reasonable worst case scenario has been assessed and that appropriate mitigation is secured without this information?</p> <p>Has a timeframe been identified to resolve any outstanding matters of disagreement prior to detailed design?</p>	<p>The approach to modelling is understood to be agreed and represents a reasonable worst-case scenario. The outstanding comments from the Environment Agency's review of the baseline modelling are matters of detail which are appropriately to be considered once the detailed design has been settled. These comments will be addressed within the Detailed Design Model. The Detailed Design model will also incorporate the latest 2021 Climate Change values. The Detailed Design model is programmed for completion w/c 11th April 2022 and will be submitted to the Environment Agency for review / comment.</p> <p>Requirement 9 of the draft DCO secures the mitigation measures identified in the flood risk assessment (FRA) and includes any update to the submitted FRA which is subsequently approved by the Environment Agency to ensure no part of the authorised development will result in an exceedance of flood levels.</p>
11.3	Environment Agency Lead Local Flood Authorities	<p>Environment Agency's representation at Deadline 4 [REP4-019]</p> <p>National Highways Response to Representations made at Deadline 4 [REP5-022]</p> <p>River Etherow modelling</p>	<p>As above, it is noted that the modelling of the River Etherow has not yet been agreed with the Environment Agency. The Applicant has responded to the concerns of the Environment Agency [REP5-022] stating the intention to address this matter at Detailed Design Stage.</p> <p>a) Do the Environment Agency or the Lead Local Flood Authorities have any comments on the Applicant's response?</p> <p>b) What issues remain outstanding?</p> <p>c) Is this approach acceptable to the Environment Agency and the Lead Local Flood Authorities?</p>	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
11.	The water environment, drainage, flood risk assessment, Water Frameworks Directive			
11.4	Applicant Environment Agency	<p>Risk to abstraction boreholes, etc.</p> <p>Environment Agency's representation at Deadline 4 [REP4-019]</p> <p>National Highways Deadline 5 Submission - Environmental Statement - Chapter 13: Road Drainage and the Water Environment (Tracked) [REP5-020]</p> <p>National Highways Deadline 5 Submission - Applicants comments on Deadline 4 submissions [REP5-022]</p>	<p>The Environment Agency has identified concerns that dewatering of the below ground structures within the scheme may artificially dewater natural aquifer bodies.</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>a) What survey information has been gathered of water features to date which would inform discussions with the Environment Agency?</p> <p>b) What additional information is required?</p> <p>c) How could this information be gathered, and within what timeframe?</p> <p>d) How can the ExA be satisfied that a reasonable worst case scenario has been assessed and that appropriate mitigation is secured without this information?</p>	<p>a) A Water Features Survey for the Scheme was completed in 2019. This Survey involved visits to all properties known to have private abstractions within 1 km of the Scheme's Draft Order Limits. 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 (REP5-011) submitted at Deadline 5. Potential impacts due to dewatering on identified receptors have been assessed in Appendix 13.2 Hydrogeological Risk Assessment of the ES (REP3-025) and quantified using a groundwater model. Flow impacts on surface water receptors are summarised in Tables 4.2 and 4.3 of the Hydrogeological Risk Assessment. Drawdown impacts on groundwater receptors, including current private abstractions identified within 1 km of the Scheme, are summarised in Tables 4.4 and 4.5. All non-negligible impacts have been judged to be of 'slight adverse' significance since modelled drawdowns are not anticipated to cause any significant derogation of water supply.</p> <p>b) and c) If the Environment Agency require additional information due to outstanding concerns on the impact of dewatering on private abstractions following their review of the Appendix 13.2 Hydrogeological Risk Assessment, the Applicant will work to provide the information as soon as is practicable.</p> <p>d) Appendix 13.2 Hydrogeological Risk Assessment has quantified drawdown impacts on private abstractions using a groundwater model. The model has been carefully constructed and calibrated using field data to ensure that it simulates well the hydrogeological environment. All the key elements of the Scheme that may impact groundwater have been incorporated into a model run. This scenario is considered to represent a reasonable worst-case because it simulates the long-term impacts post-construction when drawdown impacts will have extended to their maximum spatial extent. This scenario run has been used to quantify drawdown impacts on private abstractions (see Tables 4.4 and 4.5 of the Hydrogeological Risk Assessment (REP3-025)). Although modelled drawdowns are not anticipated to cause any significant derogation of water supplies, baseline monitoring of key receptors prior to construction will be undertaken as part of a monitoring strategy and will continue during and post the construction period.</p>
Flood Risk and drainage				

No	Question to	Reference	Question	National Highways' response
11. The water environment, drainage, flood risk assessment, Water Frameworks Directive				
11.5	Applicant	Environment Agency's Representation at Deadline 4 [REP4-019] National Highways Response to Representations made at Deadline 4 [REP5-022]	There are concerns that the Flood Risk assessment has not been updated to reflect the latest fluvial climate change allowances that were introduced in 2021. The Applicant has responded to the concerns of the Environment Agency [REP5-022] stating the intention to address this matter at Detailed Design Stage. a) How can the ExA be satisfied that a reasonable worst case scenario has been assessed and that appropriate mitigation is secured without this information? b) Has a timeframe been identified to resolve any outstanding matters of disagreement prior to detailed design?	a) The Detailed Design model is currently underway to support the Detailed Design stage and incorporates the latest 2021 Climate Change values. Current findings indicate that National Highways can demonstrate that the proposed mitigation measures secured by the submitted Flood Risk Assessment (REP5-019) are sufficient to mitigate flood risk for a reasonable worst case future scenario. b) The Detailed Design model is programmed for completion week commencing 11 th April 2022 and will be submitted to the Environment Agency for review / comment. When available, the Applicant will consult the EA on the draft Detailed FRA. This is currently programmed for May 2022.
11.6	Environment Agency Lead Local Flood Authorities	Environment Agency's Representation at Deadline 4 [REP4-019] National Highways Response to Representations made at Deadline 4 [REP5-022]	As above, there are concerns that the Flood Risk assessment has not been updated to reflect the latest fluvial climate change allowances that were introduced in 2021. The Applicant has responded to the concerns of the Environment Agency [REP5-022] stating the intention to address this matter at Detailed Design Stage. a) Does the Environment Agency or the Lead Local Flood Authorities have any comments on the Applicant's response? b) What issues remain outstanding? Is this approach acceptable to the Environment Agency and the Lead Local Flood Authorities?	National Highways has no comments to make.
11.7	Environment Agency Lead Local Flood Authorities	Environment Agency's Representation at Deadline 4 [REP4-019]	The Environment Agency is concerned that it has not yet seen a proposed surface water drainage strategy. The Applicant has provided a Drainage Design Strategy Report [APP-188]. a) Is this sufficient for the Environment Agency to comment on? b) If not, what further information is needed? c) Are the Lead Local Flood Authorities satisfied with the information supplied? If not do they have any comments?	National Highways has no comments to make.
11.8	Applicant	Access on Carrhouse Lane [REP4-028]	Concerns have been raised regarding surface water drainage in the vicinity of the Carrhouse Lane underpass. a) What investigation has been carried out in the suitability of existing drainage infrastructure to cope following development? Is the existing infrastructure, combined with the proposed infrastructure satisfactory?	Carrhouse Lane underpass is not located at the low point of the proposed alignment of the diverted Carrhouse Lane and therefore surface water will not pond below the underpass. The vertical alignment continues to fall to the south where water is collected before discharging into a watercourse. The existing watercourse has been surveyed to ensure the tie in for the proposed drainage pipework can be achieved. The process described in the Drainage Design

No	Question to	Reference	Question	National Highways' response
11.	The water environment, drainage, flood risk assessment, Water Frameworks Directive			
				Strategy Report (APP-188) will be followed in that the outfall rate from the proposed drainage will be attenuated to pre-development greenfield run-off flow rates.
11.9	Applicant Local authorities Local highway authorities	First Written Questions [PD-009 Q11.13]	Please provide an update regarding discussions seeking to secure future maintenance of the relevant works.	Carrhouse Lane will remain unadopted so the maintenance of the drainage will be carried out by the landowner. The drainage infrastructure will be designed to provide a minimum design lifetime of 60 years in accordance with DMRB CG 501 Design of Highway Drainage Systems but will require routine maintenance to ensure this is achieved. but will require routine maintenance to ensure this is achieved.
Water Habitat				
11.10	Applicant Environment Agency	Contaminated runoff Environment Agency Deadline 2 Submission - Response to the Examining Authority's First Written Questions (WQ1) [REP2-052 Q11.16] National Highways Deadline 2 Submission - Applicant's response to Examining Authority's First Written Questions [REP2-021] National Highways Deadline 5 Submission -	In their response to First Written Questions Q11.16 [REP2-052] The Environment Agency identified a need to address the matter of water contaminated by road salting and gritting within the Environmental Statement - Chapter 13: Road Drainage and the Water Environment. Particulate matter from brake and tyre wear may also be generated. The applicant responded to the same question in its responses to First Written Questions [REP2-021] and amended Environmental Statement - Chapter 13: Road Drainage and the Water Environment (Tracked) [REP5-020]. a) Does the Applicant's response and amendment of Environmental Statement - Chapter 13: Road Drainage and the Water Environment satisfactorily address the Environment Agency's concerns in regard to road salt and gritting? b) If not, what concerns remain and how might these be addressed? c) Does the Environment Agency or the Applicant have any comments in regard to particulates in runoff? d) Should the Environmental Statement - Chapter 13: Road Drainage and the Water Environment be amended to address particulate contamination in runoff? e) Are amendments also needed to the Drainage Design Strategy Report [APP-188] to address these issues?	a) National Highways has no comments to make. b) National Highways has no comments to make. c) National Highways has no comments to make. d) Particulate contamination in runoff is covered by the HEWRAT assessment presented in ES Appendix 13.1: Water Environment Data and Assessments.(APP-178). e) Section 5.1.3 of the Drainage Design Strategy confirms that mitigation has been included within the drainage design as a result of the HEWRAT assessments. Therefore, no amendment is needed of the document.

No	Question to	Reference	Question	National Highways' response
11.	The water environment, drainage, flood risk assessment, Water Frameworks Directive			
		Environmental Statement - Chapter 13: Road Drainage and the Water Environment (Tracked) [REP5-020] Drainage Design Strategy Report [APP-188]		
Remaining Concerns				
11.11	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of the water environment, drainage, flood risk assessment, or the Water Frameworks Directive?	National Highways has no comments to make.
11.12	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of the water environment, drainage, flood risk assessment, or the Water Frameworks Directive?	National Highways has no comments to make.
11.13	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of the water environment, drainage, flood risk assessment, or the Water Frameworks Directive?	National Highways has no comments to make.
11.14	Environment Agency	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Environment Agency summarise any remaining concerns that it has about the Applicant's consideration of the water environment, drainage, flood risk assessment, or the Water Frameworks Directive?	National Highways has no comments to make.

13. Biodiversity, ecological and geological conservation, Habitat Regulation Assessment

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
	Biodiversity			
12.1	Applicant Environment Agency	Invasive non-native species National Highways Deadline 2 Submission - Draft Statement of Common Ground with Environment Agency [REP2-026] National Highways Deadline 5 Submission - Outline Landscape and Ecological Management and Monitoring Plan [REP5-018]	The Draft Statement of Common Ground with Environment Agency [REP2-026] refers, at 10.1.3.3, to the presence of a number of invasive / non-native species within red line area and potential opportunity to improve ecological quality of some priority habitats currently identified as having these non-native species. The Applicant has submitted an Outline Landscape and Ecological Management and Monitoring Plan [REP5-018]. a) Should the Applicant's documents refer to the use of best practice measures, as referred to by the Environment Agency? Would the Environment Agency provide comments on the suitability of the measures to control invasive non-native species contained within the above document?	Best practice measures, as outlined by the Environment Agency, will be incorporated into the Outline Landscape and Environmental Management Plan as submitted as part of the Deadline 6 submission.
12.2	Environment Agency Natural England	Approach to mammal crossings, otter fencing and other measures within water environment assessment. First Written Questions [PD-009 Q12.10] National Highways Deadline 2	The applicant responded to Q12.10 in its responses to First Written Questions [REP2-021] that other mitigation measures located in the vicinity of watercourses (e.g. mammal crossings, otter fencing) have not been explicitly assessed at the current stage of design, but will be considered further during the detailed design phase. a) Do the Environment Agency or Natural England have any comments on the Applicant's response? Is this approach acceptable to the Environment Agency and the Natural England?	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
12. Biodiversity, ecological and geological conservation, Habitat Regulation Assessment				
		Submission - Applicant's response to Examining Authority's First Written Questions [REP2-021]		
12.3	Applicant	Peat degradation within the National Park.	<p>Air quality and particulate contamination in runoff has potential to affect the peat deposits within the National Park.</p> <p>a) What consideration has been made of the impact of such contamination specifically on the peat deposits and future health of the moss which contributes to the deposits and ensures their future?</p> <p>b) Is mitigation required?</p> <p>c) If so, what mitigation could be provided?</p> <p>d) How would this be secured?</p> <p>If not, please provide comments to justify this conclusion.</p>	<p>Any impacts upon habitats within the Peak District have been screened out as part of the Habitats Regulations Assessment (REP2-004). The Peak District National Park is located upstream from the Scheme, therefore, there are no potential impact pathways due to particulate in runoff. As a result, no mitigation is required, however, best practice methods for environmental protection would be adhered to, such as the Guidance on Pollution Prevention and the Construction Industry CIRIA C715 Environmental good practice guidelines.</p>
12.4	Applicant	<p>Disturbance to qualifying features of the Dark Peak SSSI</p> <p>Peak District National Park Authority representation at Deadline 4 [REP4-012].</p>	<p>Would the Applicant please respond to the specific concerns raised in Peak District National Park's response at Deadline 4 [REP4-012] in regard to displacement of birds from noise disturbance and potential reduction in populations of 30-100% of populations in a 1km zone from road, and disturbance effects increasing with traffic volume.</p>	<p>With the already high number of vehicles using the roads (such as 10,700 AADT within the A628 and 3,050 AADT within the A57), it is considered that these roads already have high levels of existing usage. There does not appear to be any long-term surveys of bird traffic fatalities in the UK, but a series of independent surveys that have all used different survey intensities, methodologies and study areas and on differing species groups. Therefore, it is difficult to draw sound conclusions from cited studies.</p> <p>The noise assessment (refer to Chapter 11: Noise and Vibration (REP3-007)) sets out the predicted changes in noise levels associated with the Scheme. The assessment concluded that for the A628 that existing noise levels of 71.0 dB are currently experienced and that with the Scheme the change would be approximately 0.2 dB and would be considered negligible and not perceptible. For the A57 the assessment concluded that the existing noise levels are 63.1 dB and would rise to 64.4, an increase of 2.3 dB which would be discernible. Whilst this level would be perceptible, it is not considered to be a significant change.</p> <p>There is very little scientific research into noise levels and perceived changes to individual bird species. However, golden plover, for which are a qualifying feature for the Peak District Moors (South Pennine Moors Phase 1) SPA are assessed in the Waterbird Disturbance Mitigation Toolkit. The assessment concluded that golden plover are 'moderately sensitive to noise disturbance' but with little direct evidence, a precautionary approach assumes tolerance of noise up to 72 dB being acceptable but with caution at levels above 55 dB'. The noise assessment for the A57 (A628 not considered a</p>

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
				<p>perceptible change) will rise from 63.1 to 65.4 dB, which is below the tolerance level identified.</p> <p>It is considered likely that species are already habituated to background noise and visual levels. Whilst the scientific literature recognises the impacts of roads on bird species, it is important to consider the existing vehicle usage, and an increase arising as a result of the Scheme, which in this case, is not considered to be significant.</p>
12.5	Applicant	<p>Effect on the mountain hare population.</p> <p>Peak District National Park Authority Deadline 4 Submission - Post-hearing submissions requested by the Examining Authority [REP4-012]</p> <p>CPRE Peak District and South Yorkshire Branch Deadline 5 Submission - Response to National Highways comments on CPRE Peak District and South Yorkshire Branch's Written Representation [REP5-028].</p>	<p>In their response at Deadline 4 [REP4-012] Peak District National Park Authority have raised concerns regarding the potential for visual disturbance to mountain hare and the basis for excluding significant effects on the species. CPRE Peak District and South Yorkshire Branch have provided comments about current mountain hare numbers and an estimate of the proportion lost to roadkill from a report prepared in Spring 2004 [REP5-028].</p> <p>e) Please comment on potential for visual disturbance to result in significant effects to mountain hare.</p> <p>f) Please respond to PDNPA specific concerns about evidence used as the basis for excluding significant effects to mountain hare, as raised in [REP4-012].</p> <p>Please comment on the evidence submitted by CPRE Peak District and South Yorkshire Branch about current mountain hare numbers and the proportion estimated to be lost as roadkill.</p>	<p>Whilst the PDNPA has concerns about the lack of evidence for the basis of the drawn conclusions, there is a general lack of scientific evidence regarding road kill and mountain hares in general. The available recent literature attributes potential losses to predominantly climate change, disease, hybridisation, and habitat loss. Any available literature regarding roadkill and mountain hares is largely anecdotal, outdated, and would be difficult to draw sound conclusions from. Mountain hares are found primarily in areas of open upland moorland and heathland habitat. The population of mountain hares within the Peak District is estimated to be between 500 and 5000. There are limited studies into the distribution and numbers of mountain hares within England, and this is compounded by the tendency of mountain hare populations to fluctuate significantly (especially following harsh winters) making estimates difficult.</p> <p>In order to assess potential impacts, National Highways has drawn on the nocturnal traffic modelling which showed with the introduction of the Scheme (known as the 'Do Something'), the average hourly increase in vehicle passes 'off peak' would be at most: 29 passes for the A57 and 27 passes for the A628 (modelled from the year 2025 to 2051). This would equate to one additional vehicle approximately every two minutes.</p> <p>It is considered that this increase, when considering the existing levels modelled from 19:00-07:00 (known as the 'Do Minimum) of 63-90 passes for the A57 and 225-301 passes for the A628 (modelled from the year 2025 to 2051) would not significantly increase any potential roadkill.</p> <p>Therefore, it is considered unlikely that the modelled increase in vehicle passes would lead to a significant increase in roadkill of mountain hares.</p>
12.6	Natural England	<p>Peak District National Park Authority representation at</p>	<p>In their response at Deadline 4 [REP4-012] Peak District National Park Authority have raised concerns regarding the potential for visual disturbance to mountain hare and the basis for excluding significant effects on the species. CPRE Peak District and South Yorkshire Branch have provided comments about current mountain</p>	<p>National Highways has no comments to make.</p>

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
		<p>Deadline 4 [REP4-012].</p> <p>Environmental Statement - Chapter 11: Noise and Vibration [REP3-007].</p> <p>National Highways Deadline 4 Submission - 9.51 Written summary of Applicant's case at Issue Specific Hearing 2 [REP4-008]</p>	<p>hare numbers and an estimate of the proportion lost to roadkill from a report prepared in Spring 2004 [REP5-028].</p> <p>a) Does Natural England have any comment to make on the issues raised in the previous question?</p> <p>b) Please confirm whether, or not, you are satisfied with the Applicant's explanation for discounting visual disturbance as an impact pathway (see [REP4-008]) to mountain hare.</p> <p>Please comment on the evidence submitted by CPRE Peak District and South Yorkshire Branch about current mountain hare numbers and the proportion estimated to be lost as roadkill.</p>	
12.7	Peak District National Park Authority	<p>Effect on the mountain hare population.</p> <p>Natural England Deadline 4 Submission - Post-hearing submissions requested by the Examining Authority in lieu of attendance [REP4-025].</p> <p>National Highways Deadline 4 Submission - Written summary of Applicant's case at Issue</p>	<p>In their response [REP4-025] Natural England state that they are satisfied with evidence presented by the Applicant. The Applicant has provided further information in their Response submitted at Deadline 4 [REP4-008].</p> <p>Please provide any further comment that you wish to make regarding the conclusions of Natural England or the information supplied by the Applicant.</p>	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
12. Biodiversity, ecological and geological conservation, Habitat Regulation Assessment				
		Specific Hearing 2 [REP4-008]		
12.8	CPRE Peak District and South Yorkshire Branch	Effect on the mountain hare population. CPRE Peak District and South Yorkshire Branch Deadline 5 Submission - Response to National Highways comments on CPRE Peak District and South Yorkshire Branch's Written Representation [REP5-028].	In your submission at Deadline 5 [REP5-028], reference is made to the current number of mountain hare numbers located in the Peak District being in the low thousands and a report from Spring 2004 indicating that traffic on the A57 probably claims 20% of adult hares living adjacent to the road. Please can you explain the basis for the information presented about current numbers and whether there is any more recent data or evidence in respect of the proportion of mountain hares killed by traffic on the A57 and / or data or evidence relating to other relevant roads.	National Highways has no comments to make.
Habitat Regulation Assessment				
12.9	Peak District National Park Authority	Scope of concern National Highways Deadline 2 Submission - Habitats Regulations Assessment Screening Report - Appendix B PINS Screening Matrices	The Applicant has set out in [REP2-044] the justification for why there would be no likely significant effects during construction. a) Please confirm whether, or not, your Authority's concerns only relate to operational effects of the proposal. If your Authority's concerns extend to the construction phase, please provide reasoning for this conclusion.	National Highways has no comments to make.
12.10	National Trust	Potential for increased recreational pressure on qualifying	The Applicant provided an explanation as to why the proposal is unlikely to result in an increase in recreational pressure (see Table 5.1 of [REP2-044] from improving road access to the National Park and encouraging more people to visit by car. Natural England [REP2-054] has not raised any issues with the approach.	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
		features of the Special Protection Area (SPA). National Highways Deadline 2 Submission - Habitats Regulations Assessment Screening Report [REP2-004] Natural England Deadline 2 Submission - Response to the Examining Authority's First Written Questions (WQ1) [REP2-054] National Trust Deadline 2 Submission - Written Representation [REP2-079]	Please confirm whether, or not, you are satisfied with Applicant's response at [REP2-004] .	
12.11	Applicant	Disturbance to qualifying features of the SPA. Peak District National Park Authority representation at Deadline 4 [REP4-012] .	The Peak District National Park Authority [REP4-012] state that an appropriate assessment should have been undertaken in respect of the bird qualifying features of the SPA from noise and visual disturbance. Please could the Applicant respond to the following matters raised by the Peak District National Park Authority in [REP4-012] : a) The habitats used by the bird features of the SPA are described broadly in the text of [REP2-044] , but please could the Applicant submit any further evidence in this regard, for example plans to illustrate where the habitats are located relative to the road and the distances.	a) A map of the affected road network (ARN) and the boundary of the SPA is provided within Figure 5.2(ii) Air Quality Model Sensitive Receptors. b) Golden plover typically breed on heather moorland, blanket bog, acidic grasslands and montane summits, where they prefer to nest on high, flat or gently sloping plateaux, away from the moorland edge and away from the existing road network. In winter they move to lowland farmland and fields. Merlin prefer undulating or folded landforms providing wide outlooks from ground perches or nest-sites, especially heads of upland stream valleys. Heather moorland (generally 30-70 cm in height) is a preferred breeding site, but they will breed in trees, copses and windbreaks in open country where suitable passerine populations are present. They are

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
		<p><u>National Highways</u> Deadline 2 Submission - Habitats Regulations Assessment Screening Report - Appendix B PINS Screening Matrices [REP2-044].</p> <p><u>National Highways</u> Deadline 3 Submission - Environmental Statement - Chapter 11: Noise and Vibration [REP3-007].</p>	<p>b) Please explain what habitats are used for foraging by the Qualifying Features, if different to those habitats used for breeding.</p> <p>c) ES Chapter 11 [REP3-007] does not appear to quantify baseline and predicted noise levels during operation at relevant locations on the A57 and A628 for use in the HRA. Please explain how these have been established in order to reach the conclusion that there will be minor noise increase associated with the A57 and negligible increase associated with the A628.</p> <p>d) Please confirm whether, or not, consideration has been given to both the A57 and A628 with regard to the noise and visual impact pathways.</p> <p>e) Please respond to points raised about displacement of birds from noise disturbance, with potential reduction of 30-100% in populations in a 1km zone from road, and disturbance effects increasing with traffic volume.</p>	<p>likely to be restricted locally to the extensive heather moorlands situated away from the affected road network. In winter the birds to inland lowland areas and coastal areas.</p> <p>Short eared owl breed in a wide range of open habitats including tundra, steppe, bogs, dunes, moorland, heathland, young plantations and more occasionally in crops.</p> <p>However, the species requires extensive open land in which to breed and is thus unlikely to breed in close proximity to existing roads.</p> <p>All habitats within the SPA are suitable for foraging.</p> <p>c) The assessment methodology for the operation phase noise assessment is set out in paragraphs 11.3.36 to 11.3.51 Environmental Statement – Chapter 11: Noise and Vibration (REP3-007). The baseline condition for the operation phase assessment is the “Do Minimum Opening Year” traffic scenario, which represents conditions without the Scheme in its proposed opening year. The predicted noise levels from this scenario were compared against those for the other three traffic scenarios described in paragraph 11.3.36 (REP3-007). The impact magnitudes to the A57 and A628 through the Peak District National Park were assigned using the criteria stated in Table 11.9 and Table 11.10 of (REP3-007), which are linked to the numeric change in predicted noise levels with reference to the Do Minimum Opening Year scenario. The noise assessment (refer to Chapter 11: Noise and Vibration (REP3-007)) sets out the predicted changes in noise levels associated with the Scheme. The assessment concluded that for the A628 that existing noise levels of 71.0 dB are currently experienced and that with the Scheme the change would be approximately 0.2 dB and would be considered negligible and not perceptible. For the A57 the assessment concluded that the existing noise levels are 63.1 dB and would rise to 64.4, an increase of 2.3 dB which would be discernible. Whilst this level would be perceptible, it is not considered to be a significant change.</p> <p>d) Ref 12.4</p> <p>e) Ref 12.4</p>
12.12	Natural England	<p>Peak District National Park Authority representation at Deadline 4 [REP4-012].</p> <p><u>National Highways</u> Deadline 2</p>	<p>The Peak District National Park Authority [REP4-012] state that an appropriate assessment should have been undertaken in respect of the bird qualifying features of the SPA from noise and visual disturbance.</p> <p>c) Does Natural England have any comment to make on the issues raised in the previous question?</p> <p>Please confirm whether, or not, you are satisfied with the Applicant's explanation for discounting visual disturbance as an impact pathway (see [REP4-008]) to SPA birds</p>	<p>National Highways has no comments to make.</p>

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
		Submission - Habitats Regulations Assessment Screening Report - Appendix B PINS Screening Matrices [REP2-044] . National Highways Deadline 3 Submission - Environmental Statement - Chapter 11: Noise and Vibration [REP3-007] . National Highways Deadline 4 Submission - 9.51 Written summary of Applicant's case at Issue Specific Hearing 2 [REP4-008]		
12.13	Peak District National Park Authority	Wildfire risk National Highways Deadline 3 Submission - Comments on Local Impact Report submitted by	Please confirm whether, or not, your Authority is satisfied with the Applicant's explanation regarding wildfire risk in their response at [REP3-028] .	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
12. Biodiversity, ecological and geological conservation, Habitat Regulation Assessment				
		Peak District National Park Authority [REP3-028]		
12.14	Peak District National Park Authority	<p>Remaining concerns</p> <p>National Highways Deadline 3 Submission - Applicants comments on Written Representations.</p> <p>Natural England Deadline 4 Submission - Post-hearing submissions requested by the Examining Authority in lieu of attendance [REP4-025].</p> <p>National Highways Deadline 4 Submission - Written summary of Applicant's case at Issue Specific Hearing 2 [REP4-008].</p>	<p>In their response at [REP3-020] the Applicant confirms the A628 does not meet the DMRB LA 105 traffic scoping criteria for traffic increases.</p> <p>In their response [REP4-025] Natural England state that they are satisfied with evidence presented by Applicant. The Applicant has provided further information in their response submitted at Deadline 4 [REP4-008].</p> <p>Please provide any further comment that you wish to make in regard to the conclusions of Natural England or the information supplied by the Applicant.</p>	National Highways has no comments to make.
Remaining concerns				
12.15	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
12.	Biodiversity, ecological and geological conservation, Habitat Regulation Assessment			
12.16	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?	National Highways has no comments to make.
12.17	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?	National Highways has no comments to make.
12.18	Peak District National Park Authority	Remaining concerns	Apart the issues covered elsewhere in these second written questions, please could Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?	National Highways has no comments to make.
12.19	Natural England	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Natural England summarise any remaining concerns that it has about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?	National Highways has no comments to make.
12.20	Environment Agency	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Environment Agency England summarise any remaining concerns that it has about the Applicant's consideration of biodiversity, ecological and geological conservation, or the Habitat Regulation Assessment?	National Highways has no comments to make.

14. Land Use, Social Economic and Human Health

No	Question to	Reference	Question	National Highways' response
13.	Land use, social and economic, human health			
	Local social and economic impacts			
13.1	Christopher Hill	Effect on business at 15 Old Hall Lane.	Your Additional Submission [AS-002] refers to effects on a local business resulting from acquisition of the property from which the business is run. a) Please provide details of how the business is likely to be affected, including, but not restricted to: - <ul style="list-style-type: none"> • The turnover of the business. • The number of people that the business employs. • Whether, or not, it is possible to relocate the business. The likely effects of relocation should this prove to be possible.	National Highways has no comments to make.
13.2	NTELC (National Thermal Engineering Limited) Steeple Building and Preservation Owen Mark Pugh	Effects on businesses at Roe Cross Lane Industrial Estates Units H, J, K and L.	a) Please provide details of how the business is likely to be affected, including, but not restricted to: - <ul style="list-style-type: none"> • The turnover of the business. • The number of people that the business employs. • Whether, or not, it is possible to relocate the business. The likely effects of relocation should this prove to be possible.	National Highways has no comments to make.
	Remaining concerns			
13.3	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of land use, social and economic, or human health?	National Highways has no comments to make.
13.4	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of land use, social and economic, or human health?	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
13.	Land use, social and economic, human health			
13.5	High Peak Borough Council	Remaining concerns	Apart the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of land use, social and economic, or human health?	National Highways has no comments to make.
13.6	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of land use, social and economic, or human health?	National Highways has no comments to make.

15. Other environmental topics

No	Question to	Reference	Question	National Highways' response
14.	Other environmental topics			
14.1	Derbyshire County Council	Maintenance of A57 Snake Pass and A628 Woodhead Pass	<p>There are concerns that the increase in traffic on these roads identified in the "Do-Something" scenario will increase the amount of time that these roads are closed for maintenance works.</p> <p>Is there evidence to demonstrate that the structural failures of the road are resultant from the total number of axle loads, or are they primarily associated with geology / climatic issues associated with the route?</p>	National Highways has no comments to make.
Remaining concerns				
14.2	Tameside Metropolitan Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Tameside Metropolitan Borough Council summarise any remaining concerns that it has about the Applicant's consideration of the utility infrastructure, transboundary effects, security, major accidents and disasters, civil and military aviation and defence, decommissioning, cumulative and combined effects, or other important and relevant considerations?	National Highways has no comments to make.
14.3	Derbyshire County Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Derbyshire County Council summarise any remaining concerns that it has about the Applicant's consideration of the utility infrastructure, transboundary effects, security, major accidents and disasters, civil and military aviation and defence, decommissioning, cumulative and combined effects, or other important and relevant considerations?	National Highways has no comments to make.
14.4	High Peak Borough Council	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could High Peak Borough Council summarise any remaining concerns that it has about the Applicant's consideration of the utility infrastructure, transboundary effects, security, major accidents and disasters, civil and military aviation and defence, decommissioning, cumulative and combined effects, or other important and relevant considerations?	National Highways has no comments to make.

No	Question to	Reference	Question	National Highways' response
14.	Other environmental topics			
14.5	Peak District National Park Authority	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of the utility infrastructure, transboundary effects, security, major accidents and disasters, civil and military aviation and defence, decommissioning, cumulative and combined effects, or other important and relevant considerations?	National Highways has no comments to make.
14.6	Environment Agency	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Environment Agency summarise any remaining concerns that it has about the Applicant's consideration of transboundary effects, cumulative and combined effects, or other important and relevant considerations?	National Highways has no comments to make.
14.7	Natural England	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could Natural England summarise any remaining concerns that it has about the Applicant's consideration of transboundary effects, cumulative and combined effects, or other important and relevant considerations?	National Highways has no comments to make.
14.8	Statutory Undertakers	Remaining concerns	Apart from the issues covered elsewhere in these second written questions, please could the Statutory Undertakers summarise any remaining concerns that it has about the Applicant's consideration of the utility infrastructure?	National Highways has no comments to make.

16. Compulsory Acquisition, Temporary Possession, Statutory Undertakers and funding

No	Question to	Reference	Question	National Highways' response
15	Compulsory Acquisition, Temporary Possession, Statutory Undertakers and funding			
15.1	Applicant John Joseph Bower Warner Eric Bower	Carr House Farm / plots 4/13a, 4/13b, 4/13c, 4/13d, 4/13e, 4/13f, 4/13g, 4/13h, 4/13i, 4/13j, 4/13k, 4/16, 4/17, 4/19, 4/20, 4/21, 5/1a, 5/1b, 5/1c, 5/1d, 5/1e, 5/1f, 5/1g, 5/1h, 5/1i, 5/1j, 5/1k, 5/2, 5/3, 5/4, 5/5, 5/7a, 5/7b, 5/7c, 5/7d, 5/7e, 5/7f, 5/7g, 5/7h, 5/8, 5/9a, 5/9b, 5/9c, 5/9d, 5/9e, 5/9f, 5/9g, 6/1a, 6/1b, 6/1c, 6/1d, 6/1e, 6/1f, 8/8a, 8/8b, 8/8c, 8/8d, 9/3, 9/7a, 9/7b, 9/7c, 9/7d, 9/7e, 9/16	Warner Bower [REP4-028] set out concerns regarding the Proposed Development and the compulsory acquisition and temporary possession powers sought by the Applicant. The submission noted that it was a jointly with John Bower. a) For completeness, please could John Bower confirm that he is content for Warner Bower to represent him to the Examination? The Applicant responded [REP5-022] Section 9]. b) Please could Warner Bower comment on the Applicant's responses and provide an update on any subsequent discussions with the Applicant? c) Please could the Applicant provide an update on the discussions and advise on the outstanding matters, the next steps to be taken and the progress anticipated by the close of the Examination? Does it anticipate that any side agreements will be required?	c) A further meeting was held with Mr W Bower on 11/02/22 to discuss updates on the following issues: Provision of access to the field reference SK00950085 – the Applicant is to ensure adequate access is provided from the diverted Carrhouse Lane. Potential impacts of the Carrhouse Lane diversion on the existing Tara Brook culvert – the Applicant is to investigate whether the proposed junction between the existing and proposed Carrhouse Lane north of the link road would have an impact on the existing Tara Brook culvert. HGV access to the farm and associated buildings – the Applicant has provided an alternative access proposal from the proposed single carriageway link for consideration by Mr Bower. Mr Bower confirmed he would respond formally on the current access proposals. Severed public right of way at Tara Brook Farm – Mr Bower agreed there is a need to stop up the cul-de-sac on his land on completion of the Scheme and would be willing to confirm this in writing. Access to during construction – the applicant confirmed that access to the farm buildings would be provided throughout the construction of the Scheme. Drainage of Carrhouse Lane – the Applicant agreed to investigate the detailed drainage proposals for the diverted Carrhouse Lane and the outfall into the existing ditch to the south of the Carrhouse Lane diversion. The Applicant has since confirmed to Mr Bower that surface water runoff from Carrhouse Lane would be collected throughout its length and would be attenuated prior to outfall into the existing ditch. No requirement for side agreements has been identified to date.

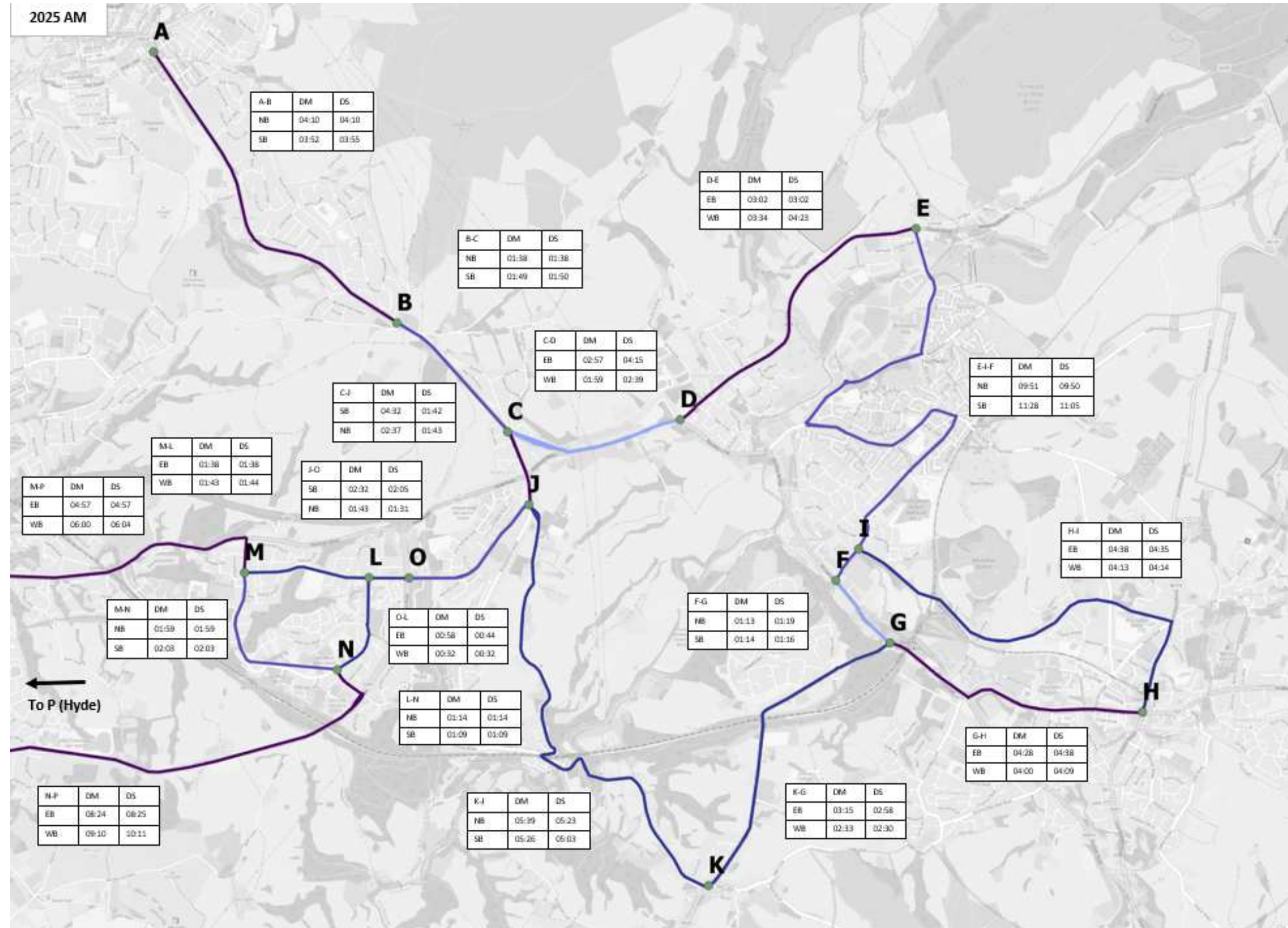
No	Question to	Reference	Question	National Highways' response
15	Compulsory Acquisition, Temporary Possession, Statutory Undertakers and funding			
15.2	Applicant Hayley Simpson Valerie Bromley	Craig Dean, 21a Old Road / plot 3/6	<p>Hayley Simpson [REP4-021] has set out concerns regarding the compulsory acquisition powers sought by the Applicant, the effects on the family and the nature and frequency of the Applicant's communications with them. The submission is also on behalf of Valerie Bromley and Michaela Bromley.</p> <p>a) For completeness, please could Valerie Bromley and Michaela Bromley confirm that they are content for Hayley Simpson to represent them to the Examination?</p> <p>b) Please could the Applicant respond to the concerns raised by Hayley Simpson?</p> <p>The ExA [EV-015 Items 5b and 5c] is exploring the potential of residents being able to retain ownership, and the issues involved with that. This was discussed at Compulsory Acquisition Hearing 1 [EV-020]. The Applicant has responded in writing [REP4-007 Items 5b and 5c] and has provided a drawing [AS-005] that sets out some of the technical issues.</p> <p>The Applicant [REP4-007 Items 5c] said that it needs to do a structural survey of Craig Dean to inform its assessment of whether the building could remain if the Proposed Development progresses. The ExA expects that information would then help it to consider the issues and options for Craig Dean.</p> <p>c) Please could Hayley Simpson comment on the Applicant's responses and provide an update on any subsequent discussions with the Applicant? Can access be provided for the structural surveys? If they can't, please could the reasons for that be explained?</p> <p>Please could the Applicant provide an update on the discussions and advise on the outstanding matters, the next steps to be taken and the progress anticipated by the close of the Examination? Does it anticipate that any side agreements will be required? How does the Applicant propose to progress if a structural survey cannot be carried out before the end of the Examination?</p>	<p>c) A further meeting was held with Mr W Bower on 11/02/22 to discuss updates on the following issues:</p> <p>Provision of access to the field reference SK00950085 – the Applicant is to ensure adequate access is provided from the diverted Carrhouse Lane.</p> <p>Potential impacts of the Carrhouse Lane diversion on the existing Tara Brook culvert – the Applicant is to investigate whether the proposed junction between the existing and proposed Carrhouse Lane north of the link road would have an impact on the existing Tara Brook culvert.</p> <p>HGV access to the farm and associated buildings – the Applicant has provided an alternative access proposal from the proposed single carriageway link for consideration by Mr Bower. Mr Bower confirmed he would respond formally on the current access proposals.</p> <p>Severed public right of way at Tara Brook Farm – Mr Bower agreed there is a need to stop up the cul-de-sac on his land on completion of the Scheme and would be willing to confirm this in writing.</p> <p>Access to during construction – the applicant confirmed that access to the farm buildings would be provided throughout the construction of the Scheme.</p> <p>Drainage of Carrhouse Lane – the Applicant agreed to investigate the detailed drainage proposals for the diverted Carrhouse Lane and the outfall into the existing ditch to the south of the Carrhouse Lane diversion. The Applicant has since confirmed to Mr Bower that surface water runoff from Carrhouse Lane would be collected throughout its length and would be attenuated prior to outfall into the existing ditch.</p> <p>No requirement for side agreements has been identified to date.</p>
15.3	Applicant Tameside Metropolitan Borough Council	L.S. Lowry statue / Plot 8/2	<p>The Book of Reference [REP5-009] includes for the compulsory acquisition of the L.S. Lowry statue in plot 8/2.</p> <p>Please could the Applicant and Tameside Metropolitan Borough Council comment on the importance of this statue and whether it would or should be relocated?</p>	<p>The L.S. Lowry statue was erected in 2005 and is not recorded in the Historic Environment Record, and as such is not considered to be a heritage asset. The statue does have aesthetic and communal value. Plot 8/2 is required in connection with detrunking works but the proposed works are not anticipated to necessitate relocation of the L.S. Lowry statue.</p>

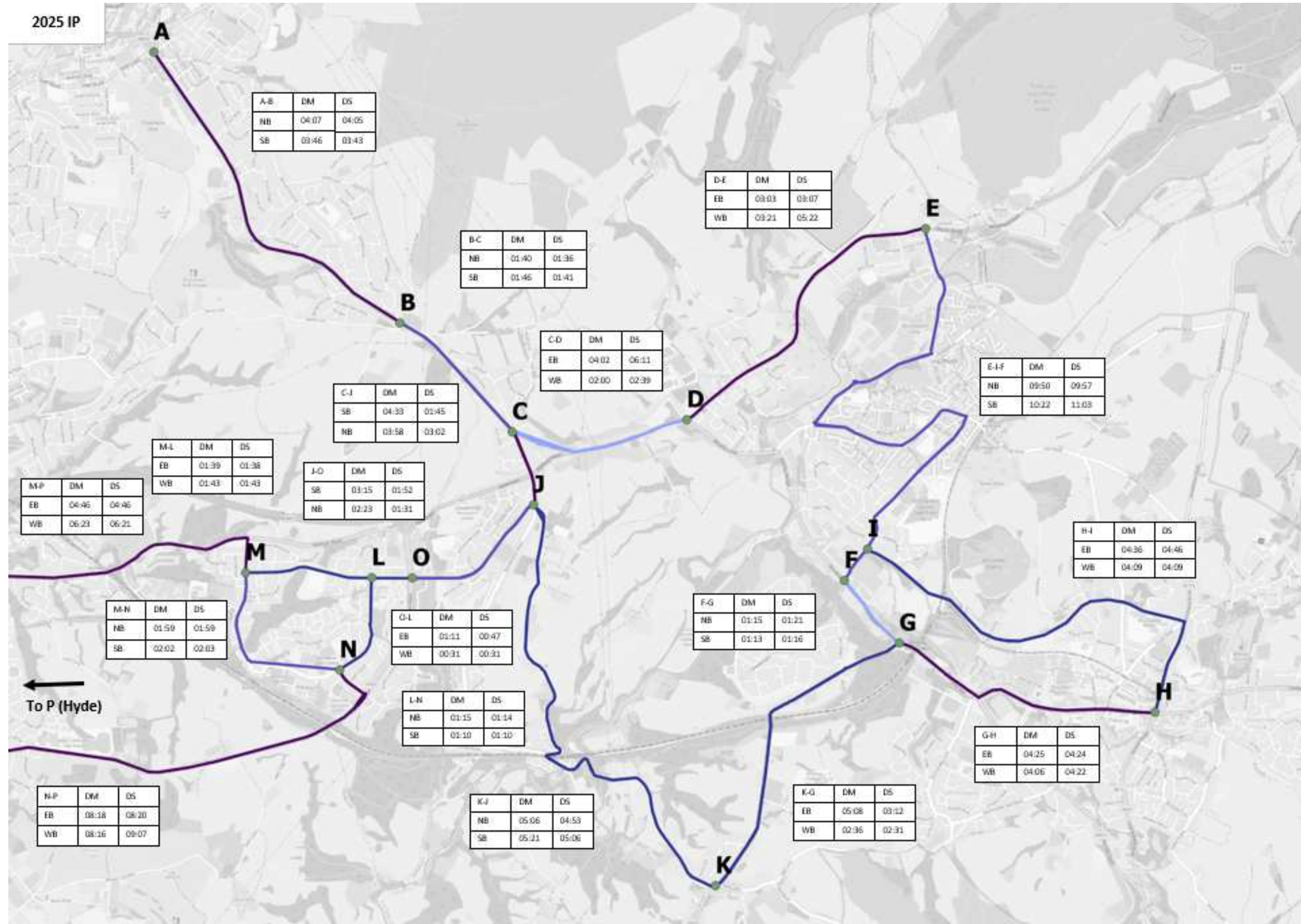
Appendix A. Plans showing changes in bus journey times by route sections (links)

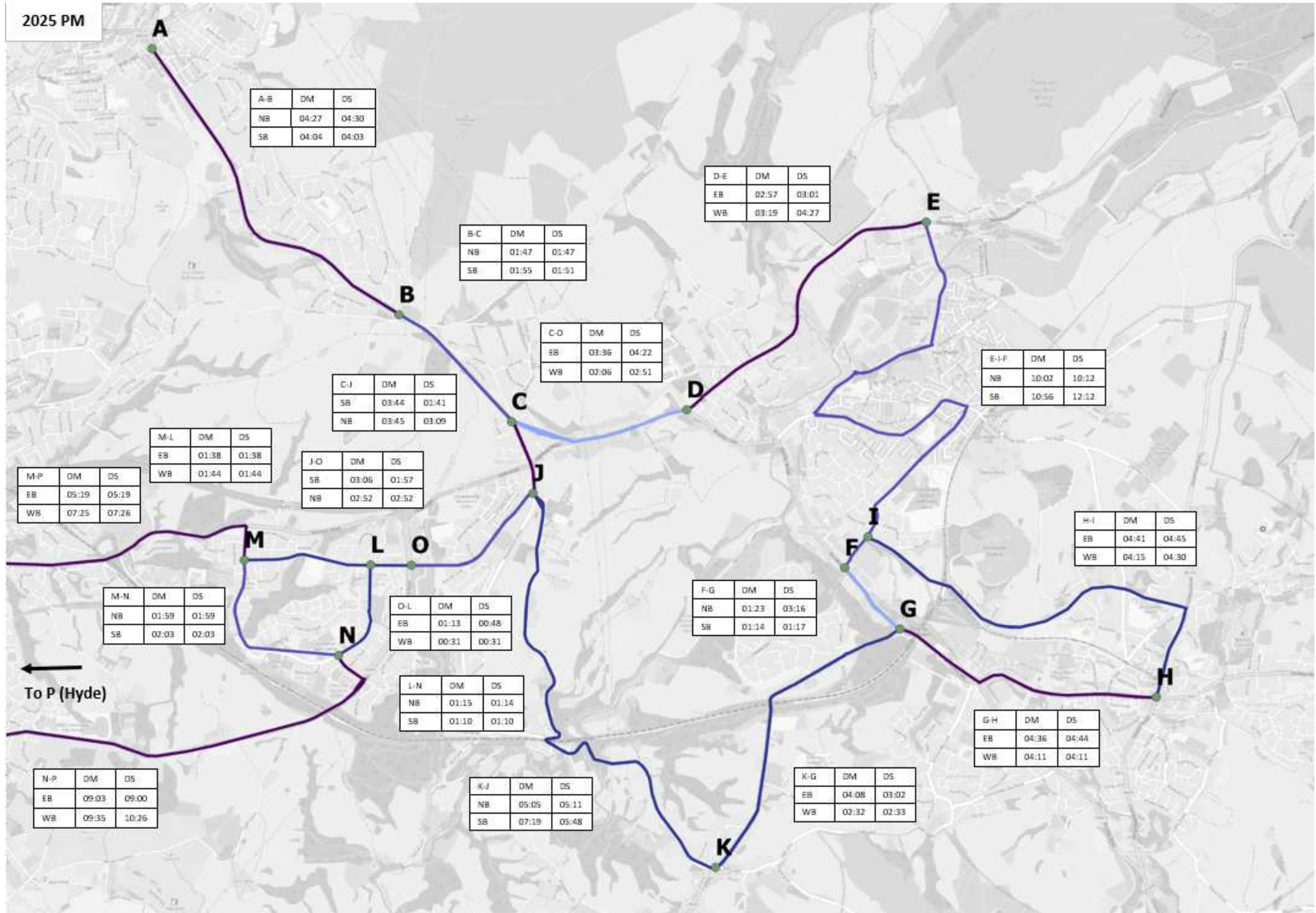
Key to Map Points

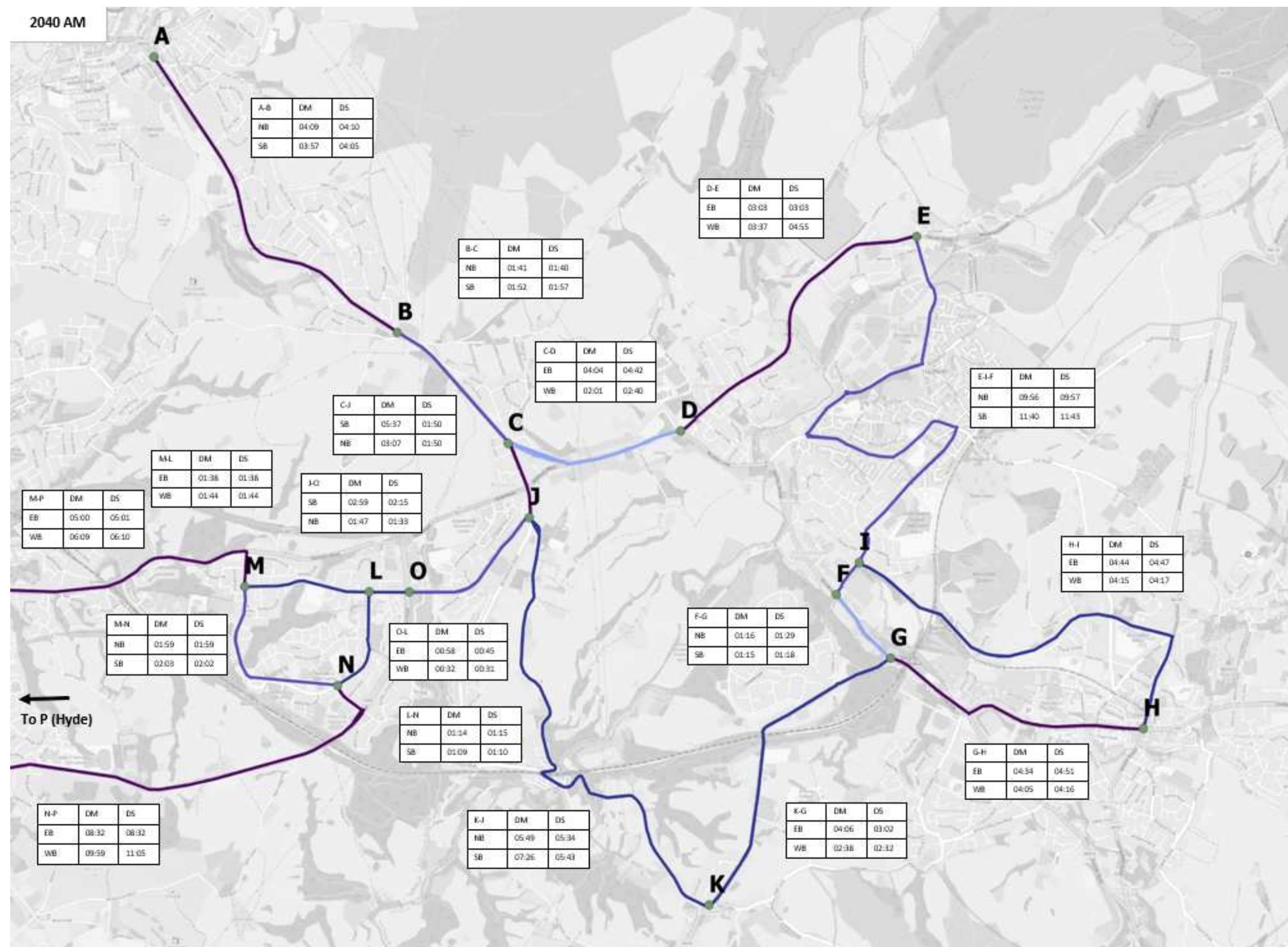
A	Acres Lane
B	Matley Lane
C	Back Moor
D	Woolley Lane
E	New Road
F	Shaw Lane
G	Glossop Road
H	Norfolk Street
I	Dinting Road
J	Ashworth Lane
K	Marple Road
L	Hattersley Road East
M	Underwood Road
N	Chapman Road
O	Stockport Road
P	Hyde

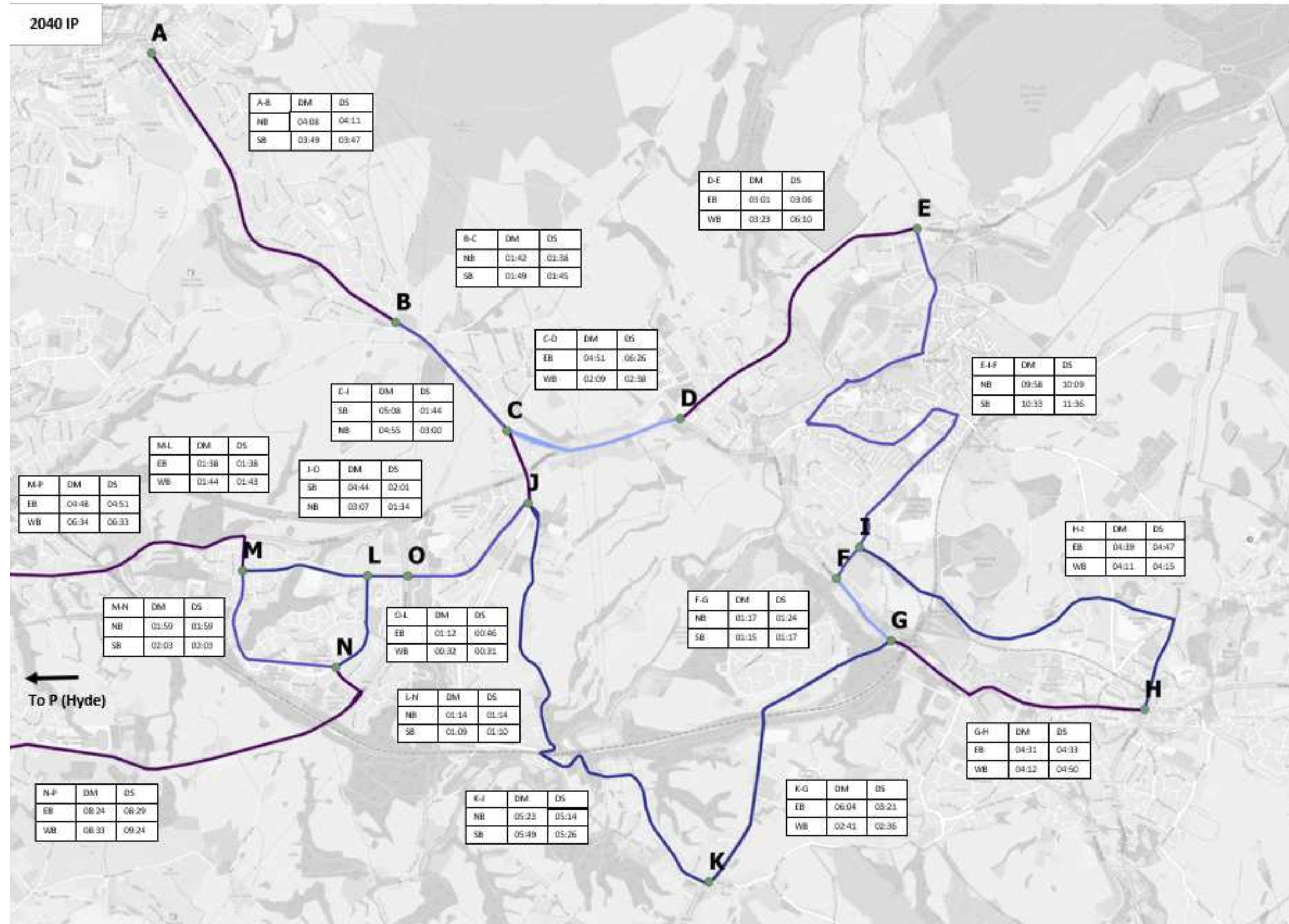
Times shown in minutes and seconds

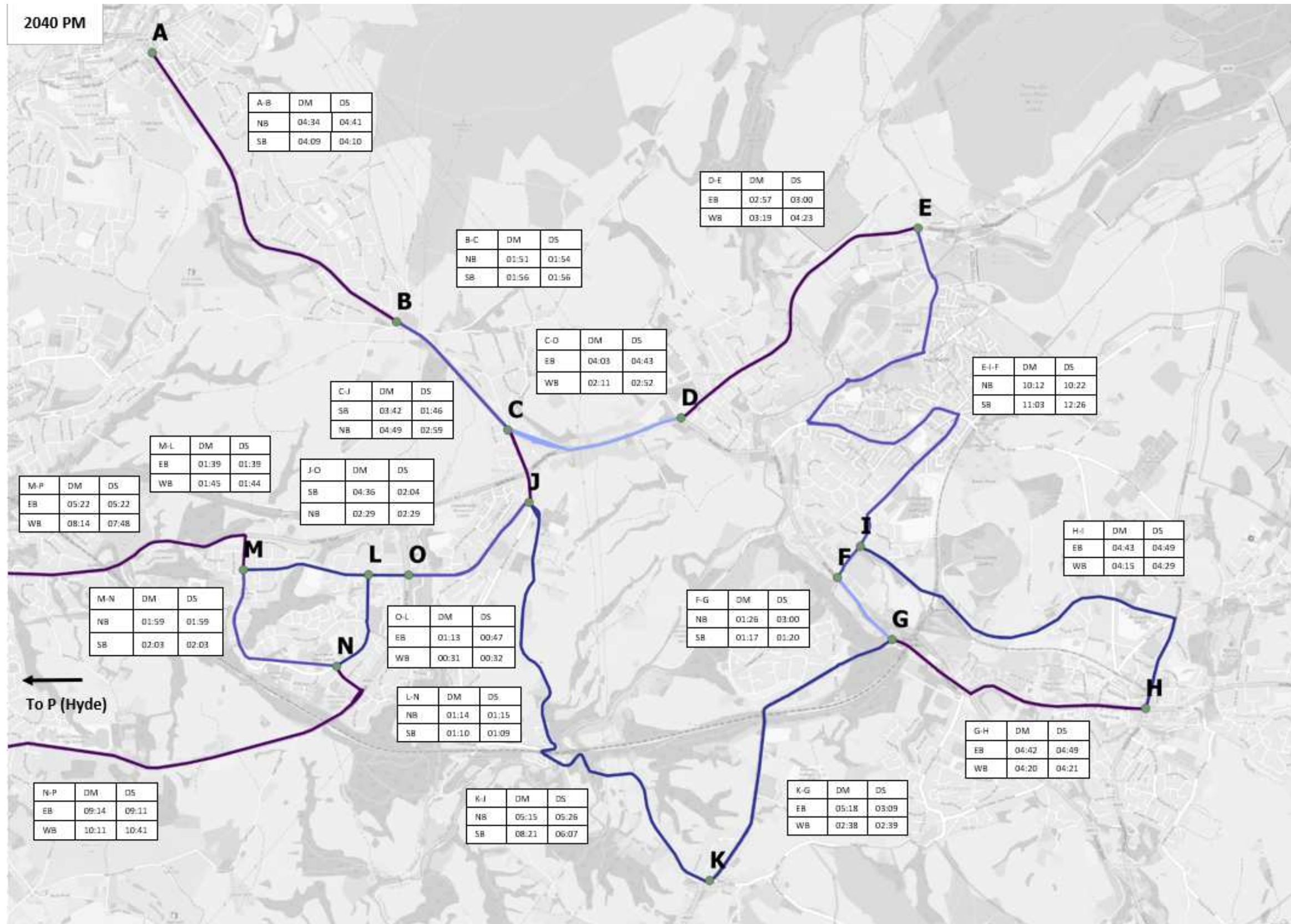












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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
National Highways Limited registered in England and Wales number 09346363