

A57 Link Roads

TR010034

**9.69 Comments on Deadline 5
responses**

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A57 Link Roads Development Consent Order 202[x]

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1. Introduction

1.1.1. This document provides the comments of the applicant, National Highways, in response to the Submissions made at Deadline 5 as requested by the Examining Authority at Deadline 7 in its Rule 8 letter dated 19 November 2021. Comments have been provided on the following documents:

- REP5-028 CPRE Peak District and South Yorkshire Branch Response to National Highways comments on CPRE Peak District and South Yorkshire Branch's Written Representation
- REP5-029 CPRE Peak District and South Yorkshire Branch Response to D4 submissions and comments on ISH2
- REP5-038 CPRE Peak District and South Yorkshire Branch Correspondence regarding CPRE's Deadline 5 submission
- REP5-030 Tameside Metropolitan Borough Council comments on ISH1
- REP5-031 Tameside Metropolitan Borough Council Comments on ISH2
- REP5-034 Derbyshire County Council Post hearing written submission
- REP5-035 High Peak Borough Council Post hearing submission
- REP5-040 Daniel Wimberley Post hearing submission

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

2. REP5-027 Charlotte Farrell Comments on Submissions at D3 and D4

Response reference:	Representation Issue	National highways Response
9.69.1	<p>Firstly it is noted that in direct contrast to previous comments made by National Highways (they said there would be a 1% decrease in traffic through Bamford in their initial response) they now agree that there will be an increase in traffic numbers along the A6013 through Bamford it says:</p> <ul style="list-style-type: none"> the increase in traffic on the A57 Snake Road/Pass due to the scheme is primarily because of traffic transferring from the A6/A623 route to the South (c50-55%). Particularly for journeys between Sheffield and Manchester Airport <p>This is in accordance with the reasons given by Highways England when they included the A6013 in their strategic assessment in 2015.</p> <ul style="list-style-type: none"> The A6013 was also considered by the study as analysis shows it provides a link between the A6187 and A57 which could be used for strategic movements. And later in that report it notes that the trunk road section of the A57 also takes traffic from the non-trunk A57, which provides an alternative and more direct route between Manchester and Sheffield [Trans-pennine routes feasibility study Stage 1 report, February 2015] <p>As a resident of Bamford and someone who regularly crosses the Snake Road near the Bamford end, I do not recognise the assumptions made about the impact of the increased traffic on residents and the effect on people walking or cycling along these roads which the applicant has made in response to various submissions.</p> <p>Traffic flowing through Bamford must either be going to or coming from the A57. Whilst accepting that a proportion of cars will travel straight across the A57 without deviating down the A6013 a large amount of them will use the A6013 because it is a gateway into the Peak District and for most, the only link south between Glossop and Sheffield.</p> <p>The assumption that absolute traffic numbers will be small and average 1 car a minute is based on the average daily usage. Assuming that the AADT has been calculated on a 12 hour basis (which I understand is normal) this 38% increase is on the whole unlikely to be spread over the whole 12 hour period evenly. Even during this period, there are obviously quiet times as well as times when the traffic flow is much greater, and it is likely that the majority of the 38% projected increase will also be at these times.</p> <p>During the summer months, the numbers of vehicles using the A57/Snake road can easily be doubled or tripled, National Highways have not said when they carried out the AADT assessment, but again this will have been averaged</p>	<p>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> <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.</p> <p>The changes in hourly traffic flows on the A57 Snake Road/Pass due to the Scheme, referenced in National Highways' response to First Written Question 3.19 (REP2-021) are the highest hourly average two-way flow from the traffic model over the AM, PM or interpeak three-hour periods. They are not based on the average daily flow being spread evenly across the day.</p> <p>National Highways recognises that there is seasonal variability in the traffic flows on both the A57 Snake Road/Pass and the A628 across the Pennines. However, in accordance with best practice, the traffic model is based on surveyed traffic flows during neutral periods (periods outside of school holidays and public holidays) so that it represents typical conditions on the road network, rather than those during particularly busy or particularly quiet times of year.</p> <p>Regarding the impact of the Scheme on severance and road safety on the A57 Snake Road/Pass, see National Highways' response 3.25 to the Examining Authority's First Written Questions (REP2-021) and items 3p and 3q in the Written summary of Applicant's case at Issue Specific Hearing 2 (REP4-008).</p>

Response reference:	Representation Issue	National highways Response
	<p>out over the year and so “levels out” high volume of traffic during peak months.</p> <p>Crossing the main road (A6013) which runs through the middle of Bamford village in the summer will become even more difficult, particularly for elderly, children and disabled people. There is no pedestrian crossing in the village (Derbyshire County Council have previously advised that they will not install one due to poor sight lines, so there is no possibility of mitigation) and therefore no safe space to cross. It will become a choice of waiting an inordinate amount of time for a possible gap, or crossing half way when a gap appears one way and waiting in the middle of a relatively small road for a gap in the opposing traffic flow. This is particularly perilous for children and wheelchair users who are lower down and not easily visible to drivers.</p> <p>The increased volume in traffic will inevitably lead to an increase in people killed or seriously injured as pedestrians or cyclists.</p> <p>Furthermore, crossing the A57/ Snake, for example to go to the Upper Derwent Valley will be exceedingly dangerous. At that point the A57 is relatively straight which means that cars regularly exceed the 50 mph speed limit.</p> <p>Crossing at other points higher up along the A57/ Snake is equally hazardous because the bends do not give sufficient time to see a car travelling at speed.</p> <p>My usual form of transport is by e-bike, however I have only been on the Snake Pass on 2 occasions, because the current traffic use is intimidating, this feeling will only increase as vehicles increase. The Government published its Decarbonisation plan last year in which it envisaged a shift from private car to active travel methods recognising the attendant public health benefits of this as well as the need to reduce vehicle journeys to reach net zero carbon emissions by 2050. The additional traffic on Snake Pass and throughout Bamford will not encourage people to cycle.</p>	

3. REP5-028 CPRE Peak District and South Yorkshire Branch Response to National Highways comments on CPRE Peak District and South Yorkshire Branch's Written Representation

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	TRANSPORT		
9.69.2	<p>CPRE: <i>The need for the A57 Link Roads is not established</i></p> <p>2.1.1. The need for the Scheme has been firmly established through the analysis underpinning the first Route Investment Strategy (RIS1) for the A57/A628 Trans Pennine route and was confirmed by the RIS1 announcement that describes the preferred intervention on which the Scheme is based. The need for the Scheme is also set out in the Case for the Scheme (REP2-016).</p>	<p>As in the Treasury Green Book, the need for this scheme must be considered in the light of whether it is the best option for achieving objectives. Our emerging package of measures - Car Free Low Carbon Travel for Longdendale and Glossopdale - reduces traffic and its impacts and so meets national regional and local policy, and would enhance the conditions for all the villages along the trunk route. It is a more effective, efficient and cheaper option to, and one that could be implemented without the disruption of the proposed road scheme.</p>	<p>Please refer to National Highways' paragraph 2.1.12 in CPRE Peak District and South Yorkshire Written Representations (REP4-009) and response to the Examining Authority's Second Written Question 3.9 (REP6-017).</p>
9.69.3	<p>2.1.2. The Scheme meets its stated objectives in addressing the identified problems as set out in the Case for the Scheme (REP2-016).</p>	<p>We disagree, as follows:</p> <p>First because the Scheme has missing objectives in particular to support the national Decarbonisation Strategy or the Greater Manchester Transport Strategy.</p> <p>Second this scheme is essentially an urban scheme assessed as though it were a rural one. This is clear from the work undertaken on the data newly supplied by NH. To illustrate this we have extracted from the model benefits for only those trips entirely within the Greater Manchester area. There is no allowance for trips between urban areas where similar sustainable policies apply. As can be seen from the map below on page 12, most of these trips are outside the area of detailed modelling and subject to the techniques of fixed costs and masking. Both of these would cause an underestimate of the impacts. Despite this the area contains 55% of all the scheme benefits.</p> <p>None of these are on trips outside the area, although these are also subject to sustainable policies in the TfGM Transport Plan. This is therefore a very stringent test and shows the inadequacy of the assessment.</p>	<p>On the first point, the current scheme objectives were set at the start of the preliminary design stage and have been carried through the project. The Transport Decarbonisation Plan was published after the application for the Development Consent Order had been made and it would not have been appropriate to change the objectives of the Scheme post submission. As set out in the Case for the Scheme (REP2-016) the Scheme has taken account of the Greater Manchester Transport Strategy.</p> <p>On the second point, the scheme will have significant impacts on both urban and rural travel, with local trips benefiting from significantly reduced congestion and longer distance trips being provided with the means to avoid lengthy diversions. The area referred is only partially controlled by the fixed cost function as indicated in the figure provided. The highlighted areas directly around the main area of influence of the scheme are contained within the area of detailed modelling. The area described contains 48% of the total scheme benefit and of this 59% lies entirely within the area of detailed modelling and so is not subject to the fixed cost function.</p> <p>Only 1.5% of the total benefit falls entirely within the area described which is controlled by the fixed cost function.</p> <p>While there are a large number of trips outside of the area of detailed modelling, the majority of these trips are not affected by the proposed scheme.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
			<p>It is not correct to say that use of the fixed cost function and masking result in an underestimate of impacts, as both of these methods are used to improve accuracy in respect to both positive and negative impacts of the modelling process without bias.</p>
9.69.4	<p>The objectives are listed in blue font in the adjacent column.</p>	<p>Connectivity - By reducing congestion and improving the reliability of people’s journeys through Mottram in Longdendale, Hollingworth and Tintwistle and also between the Manchester and Sheffield city regions. Congestion would improve on Hyde Road and on Mottram Moor between Back Moor and Stalybridge Road, if the traffic calming measures are effective. However, north-south journeys on Market Street and Stalybridge Road would be more congested and unreliable with the scheme. The already congested journeys through Hollingworth and Tintwistle would remain and could worsen. There is no evidence provided that congestion would be reduced and reliability improved on journeys between Manchester and Sheffield. At the M60 J24 interchange any benefits would be lost by increased traffic and congestion here. DCC has shown that journeys within Glossop would take longer.</p> <p>The lack of detailed modelling means that increased congestion in areas immediately to the west of the scheme (in Greater Manchester) are underestimated or missing.</p> <p>Environmental - By improving air quality and reducing noise levels in certain areas, through reduced congestion and removal of traffic from residential areas. The Scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the PDNP. Air quality and noise would reduce alongside Hyde Road and Woolley Lane but those living on Market St, Stalybridge Road and Back Moor would endure worse conditions. Traffic and congestion would increase in Glossopdale on many residential roads. The objection from the PDNPA shows the ‘unacceptable impacts’ on the PDNP have not been avoided.</p>	<p>Refer to National Highways response reference 9.54.64 in its comments on Keith Buchan on behalf of CPRE PDSY deadline 4 submission (REP5-022) regarding journey time improvements between Sheffield and Manchester delivered by the Scheme.</p> <p>It is not possible to quantify likely changes in journey time reliability due to the Scheme. However, it has been established that when a road network is operating close to or at capacity, then small increases in traffic demand will often cause exceedance in capacity which results in swift and exponential growth in traffic congestion and delay. Consequently, relatively small fluctuations in traffic demand on a road network operating close to or at capacity, such as along the A57 through Mottram, can significantly alter levels of traffic congestion and delay and thereby, result in poor journey time reliability. The Scheme will increase road capacity on the A57 between Hollingworth and the M67 to accommodate forecast traffic growth, with most of the road network in the vicinity of the Scheme forecast to operate within capacity. Consequently, the Scheme will make this section of road network less sensitive to congestion and delay from fluctuations in traffic demand and, therefore, it is anticipated to improve journey time reliability.</p> <p>Environmental effects are reported in full in the Environmental Statement, within Volume 6 of the DCO application documents. There are no reported significant adverse effects within the PDNP.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>Societal - By reconnecting local communities along the Trans-Pennine route</p> <p>Those living on Hyde Road and the western end of Mottram Moor may be reconnected if the traffic calming measures are effective. There is no reconnection for those living on eastern length of Mottram Moor, in Hollingworth, Tintwistle, Crowden, Langsett and other settlements further east.</p> <p>Capacity - By reducing delays and queues that occur during busy periods and improving the performance of junctions on the route.</p> <p>As stated above the major impacts of the scheme are hidden by the fixed network costs outside the ADM, by the masking, and by the lack of detail in the zones/network (as discussed at the ISH2).</p>	
9.69.5	<p>CPRE: <i>The Transport Appraisal Report is too superficial to allow full comprehension of the traffic effects.</i></p> <p>National Highways response:</p> <p>2.1.3. The Transport Assessment Report (TAR) (APP-185) has been prepared in accordance with best practice and presents the relevant transport related impacts of the Scheme in sufficient detail to adequately assess and comprehend its traffic effects.</p>	<p>As the DCO proceeds we learn important new facts about the scheme that have only come to light due to the information requests and questions asked by our consultant Keith Buchan. The information is still incomplete, despite the process being started in March last year. Substantial issues are being exposed such as the limited or non-existent treatment of public transport, walking and cycling in the forecasting, modelling and appraisal process. There may be some movement by NH on re-modelling and this is considered in the accompanying note. We have already demonstrated in the submission for D4 that important parameters were omitted from the uncertainty log, failing to follow the DfT Uncertainty Toolkit.</p> <p>These show that the TAR did not supply sufficient detail to assess and comprehend the traffic effects. Subsequent material has cast some light on the significance of this but it should have been in the documents originally submitted.</p>	<p>National Highways has provided further detailed information regarding the traffic modelling during the examination as and when requested by interested parties. It is not normal practice to submit all the detailed information relating to the traffic and economic analysis and modelling of a scheme due to the complexity and sheer volume of the data that underpins it, which cannot generally be understood and interpreted by interested parties, unless they are specialists in the fields of traffic modelling and economic analysis.</p>
9.69.6	<p>CPRE: <i>Alternative measures that would address the problem without invasive road building were dismissed inappropriately...</i></p> <p>2.1.4 Refer to National Highways' response RR-0282-5 to the Relevant Representations (REP1-042).</p>	<p>As above, the Green Book approach points to options as the way to deliver value for money. Given the negative performance of the scheme against many key objectives, in particular the undermining of sustainable alternatives, a non-road capacity increase package should be considered. In this case such a package is an</p>	<p>The Scheme does not undermine sustainable alternatives. The scheme provides comprehensive improvements for non-motorised user, does not overall disadvantage bus services and does not preclude future improvements to public transport.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>alternative, not one which could be introduced at the same time or subsequent to the road capacity increase. This is because the higher the benefit to road users, the greater the difficulty in persuading them to meet the DfT Decarbonisation Strategy targets. This is also the reason that modelling the road scheme with the Decarbonisation Strategy traffic reduction targets applied to the forecast but without any specific measures to achieve them would be completely misleading. This applies to the carbon assessment as well as traffic.</p>	<p>See National Highways' response 3.9. to the Examining Authority's Second Written Questions (REP6-017) regarding the sustainable transport alternative.</p> <p>Forecast traffic demand used for the assessment of the Scheme is based on The Department of Transport's (DfT) National Trip End Model (NTEM) which has not been updated to reflect the DfT's Decarbonisation Strategy as this was only published in July 2021. This is too recent to have been incorporated into NTEM and, thus, the assessment of the Scheme. It also postdates consideration of alternatives to the Scheme and selection of the preferred option.</p>
9.69.7	<p>CPRE: A lorry ban coupled with sustainable transport measures and technological improvements was never fully tested in 2015</p> <p>2.1.5. Please refer to National Highways' response RR-0170-1 to the Relevant Representations (REP1-042).</p>	<p>The test was on an earlier version, it was undertaken against a set of out of date objectives, has no allowance for a variable goods matrix, and relies on administrative complexity to reject it. These issues have still not been addressed.</p>	<p>The evaluation of the Scheme alternatives was undertaken in compliance with DfT's TAG applicable at the time.</p>
9.69.8	<p>CPRE: The strategic case for which has not been updated, as we pointed out in December 2020. The Treasury updated its Green Book in November 2020 which gave the applicant plenty of time for a review of the strategic case.</p> <p>2.1.6 The strategic case for the Scheme was reviewed and updated in 2021 to reflect the Treasury's updated Green Book issued in November 2020. The information presented in The Case for the Scheme (REP2- 016) is therefore based on the Treasury's most up to date Green Book.</p>	<p>The 2015 high level assessment of options was not repeated and this was confirmed by email. Since this is the key part of the Strategic Assessment, without this it cannot be claimed that the Strategic Case has been updated.</p>	<p>The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option.</p>
9.69.9	<p>CPRE comment: The nature of the problem has not been defined in the DCO documents.</p> <p>2.1.7 National Highways considers that the nature of the problem has been clearly defined and summarised in the DCO documents and does not underplay the complexity of the issues. CPRE has not suggested an alternative description of the problems along the corridor.</p>	<p>At the strategic level, a failure to identify and assess against key objectives such as carbon reduction, improving air quality and road safety means the problems cannot be identified correctly. A neutral or small negative is not good enough; there are clear policies to make progress on all of these and the Green Book comparison is with expenditure which would generate progress in achieving these objectives.</p> <p>We define the nature of the problem on pages 10-12 of REP2-069 our written representation. This is a holistic strategic definition that is pertinent for an NSIP being proposed as part of the SRN. For example, the PDNP is</p>	<p>An assessment of the Scheme covering carbon reduction, air quality and road safety has been undertaken by National Highways, with the outcomes of these assessments being reported in the Environment Assessment (Chapter 14 Climate (REP1-019) and Chapter 5 Air quality (REP3-006) and the TAR (APP-185)).</p> <p>Assessment of the impacts of the Scheme on the Peak District National Park (PDNP) has also been undertaken as reported in the Environmental Assessment (Chapter 5 Air quality (REP3-006), Chapter 6 Cultural heritage (REP6-005), Chapter 7 Landscape and visual effects (REP6-006), Chapter</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		included in our assessment, something that is missing from the description of the baseline situation in the Case for the Scheme, the Transport Assessment Report and the ES chapters 1-4.	8 Biodiversity (REP6-008) and Chapter 11 Noise and vibration (REP3-007)).
9.69.10	<p><i>CPRE: It's piecemeal development</i></p> <p>2.1.8 The performance of the whole of the Strategic Road Network (SRN) is regularly reviewed by National Highways through periodic refreshment of Route Investment Strategies (RIS). Should future RIS identify a need for further interventions on the A57/A628 corridor to address identified problems, then these would be considered alongside other priorities and competing needs across the SRN.</p> <p>2.1.9. There are other Trans Pennine schemes either being planned or progressed, e.g. Network Rail's Transpennine Route Upgrade (TRU) for the railway between York and Manchester via Leeds and Huddersfield. The A57 Link Road scheme is therefore one of several interventions for improvements to transportation across the Pennines that all form part of a strategic approach to planning for cross-Pennine transportation. The Examination is, however, only concerned with the Scheme which is the subject of the dDCO.</p>	NH's arguments in 2.1.8 and 2.1.9 do not address the point that this scheme is what remains of previous, larger scale proposals; the whole issue of piecemeal implementation disguising real strategic impacts was dealt with as far back as the 1980s and SACTRA. To avoid giving that impression, NH should present its plans for the entire route, in the context of the wider SRN, and present the impacts and how they would be addressed along the entire route.	National Highways' plans for the entire route are set out in the Route Investment Strategy (RIS) for the A57/A628 corridor. The proposed Scheme represents National Highways' current approach to implementing the plans for the corridor identified in the latest, second, RIS period.
9.69.11	<p><i>CPRE: Instead of following Government guidance (webTAG at the time) the scope of the trans-Pennine Feasibility Study addressed the symptoms not the problem. The geographical scope of the study interpreted trans-Pennine as 'connectivity between Manchester and Sheffield', with the M62 excluded. National Park statutory purposes and policy were misunderstood and incorrectly applied.</i></p> <p><i>2.1.10 National Highways fully understands and appreciates the Peak District's statutory purposes and policies. These have been given proper consideration through a thorough review of applicable policies and the Scheme's compliance with them presented in the Case for the Scheme (REP2-016).</i></p>	The objection from the PDNPA shows NH's interpretation of the statutory purposes and policies does not meet the standard required of its s.62 duty under the Environment Act 1995	Please see National Highways response to Second Written Question 4.2 in National Highways' response to Second Written Questions (page 32, REP6-017).

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
9.69.12	<p>CPRE: <i>The webTAG guidance towards generating and sifting options was not followed, and the assessment of the sifted options was not robust</i></p> <p>2.2.11 National Highways is satisfied that the identification of potential interventions to address the identified problems and the sifting of options fully complied with Department of Transport’s Transport Analysis Guidance (TAG) as well as National Highways’ own internal Project Control Framework (PCF) process that were applicable at the time that the shifting of options was undertaken.</p>	<p>This is dealt with in our responses earlier: the 2015 sift is out of date and the current scheme has not been reassessed against new strategic objectives.</p>	<p>See previous responses regarding the Scheme assessment and consideration of alternatives postdating the DfT’s Decarbonisation Strategy and updated Green Book.</p>
9.69.13	<p>CPRE: <i>Car Free Low Carbon Travel for Longdendale and Glossopdale</i></p> <p>2.1.12 Scheme includes signalisation of the M67 roundabout; traffic calming on the de-trunked section of the A57 (that will also provide public realm improvements); and substantial enhancements for pedestrian, cyclists and equestrians. Furthermore, it does not preclude the potential future introduction of the other proposed interventions listed by CPRE outside of the Scheme should it be demonstrated that they provide adequate benefits for users and could be funded.</p>	<p>The increase in road capacity would increase car dependency and undermine GM’s policy aims for 50% of journeys by active travel and public transport by 2040, with a 17% reduction in car trips. DfT’s decarbonisation plan also seeks 50% of urban trips by active travel by 2030. Our proposed measures are aligned with the GM policies. MTRU has shown the disbenefits and costs this would incur to GM for at least the next 30 years. The key point is that the encouragement of driving in urban areas directly undermines the policies for reducing by switching to walk, cycle and public transport, as set out in the DfT Decarbonisation Strategy and citywide policies such as in TfGM and Sheffield. Also see answer to 2.1.4 above</p>	<p>Both the Greater Manchester policies and the DfT Decarbonisation Strategy do not necessarily rule out increasing road capacity where necessary to enable economic development.</p> <p>The scheme enables significant reductions in journey distance, with trips to and from Manchester, which currently divert as far away as the M62 to cross the Pennines, being given a much more direct option. In addition, traffic through Mottram will be diverted onto the new link road away from populated areas.</p>
9.69.14	<p>CPRE: <i>4.2.4 Omission of Greater Manchester and Sheffield conurbations from the Study area</i></p> <p>2.1.13 see National Highways’ responses 3.1 and 3.2 to the Examining Authority’s First Written Questions (REP2-021).</p>	<p>The further work and ongoing data received reveals how far the scheme impacts lie in an area which is outside the Area of Detailed Modelling and therefore subject to major interventions to reduce the impact on traffic through masking and the fixed cost function (FCF). The zones and network were revised to give more detail in the immediate area of the scheme. Given its impacts are mainly in Manchester, even with the damping effects of masking and FCF, a similar approach should have been adopted in those areas.</p>	<p>National Highways, in consultation with the relevant stakeholders, did not identify a requirement to further refine the traffic model within Manchester. National Highways and the relevant highway authorities are satisfied that the level of detail in the traffic model is entirely appropriate for a proportionate assessment of the impacts of the Scheme.</p>
9.69.15	<p>CPRE: <i>4.2.5 Traffic model refinement - The TPU Stage 3 combined modelling and appraisal report indicates that model refinement took place to alter the distribution of traffic within Glossop, and through Tintwistle.</i></p>	<p>The NH response essentially supports the comments made above - it’s just that such refinement was not made in the western approaches to the scheme.</p>	<p>Refer to National Highways’ response to 9.69.14</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>2.1.14 The traffic modelling used to assess the Scheme is based on a refined and improved version of the Trans Pennine South Regional Model. The zoning covering Glossop within this model was previously treated at an aggregate level that was considered too coarse for adequate assessment of the Scheme. Consequently, the model was refined to ensure that the distribution of modelled trips better reflected the geographical spread of local housing and employment across Glossop by disaggregating the demand into more finely defined zones. The refinement of the traffic model therefore enabled a more accurate assessment to be undertaken of the likely forecast impact of the Scheme on traffic flows, including within Glossop and through Tintwistle.</p>		
9.69.16	<p>CPRE: 4.2.7 <i>In the context of the above model refinement the traffic forecasting results on the A628T east of Tinwistle and on Glossop High Street appear perverse.</i></p> <p>2.1.15 The traffic modelling accurately forecasts changes in traffic flows due to the Scheme, including on the A628 east of Tintwistle and Glossop High Street.</p>	See above	
9.69.17	<p>CPRE: 4.2.10 <i>It appears that refinement of the traffic model could have altered the outcomes for the environmental statement accompanying the DCO application. The assumption that modelled traffic would follow new routes may be unrealistic.</i></p> <p>2.1.16 The environmental statement is based on the traffic modelling undertaken to assess the impact of the Scheme, which as stated above, was refined to provide a higher degree of accuracy within the Area of Detailed Modelling (ADM). Regarding the assumption that modelled traffic would follow new routes may be unrealistic, see National Highways' response to 4.2.7 above.</p>	See above	
9.69.18	<p>CPRE: <i>No details of these schemes or developments are supplied or appended to the TAR.</i></p> <p>2.1.17 The forecast traffic demand used for the assessment of the Scheme is primarily derived from the</p>	As offered in 2.1.18, please may we see the complete list, ie the long list and the short list, of schemes and developments excluded and included in the Uncertainty Log.	The uncertainty log is included in Appendices B & C of the Traffic Forecasting Report that has previously been provided by National Highways to CPRE. The list of reasonably foreseeable developments that have been included in the

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>Department of Transport’s (DfT) National Trip End Model (NTEM). NTEM provides forecast growth in trips based on forecast changes in the economy and demographics by area, e.g. forecast changes in population, car ownership, household spending, levels of employment, etc. NTEM therefore inherently accounts for future development since population growth cannot take place without additional housing development and economic growth cannot take place without additional commercial development. However, NTEM trip origins and destinations are based on relatively large geographical areas (Ward level) and do not therefore reflect the specific locations within each area of future developments that will enable growth. To adjust for this, the matrices of the origins and destinations of forecast trips used in the traffic modelling are adjusted to take account of committed development by refining the start and end points of trips to reflect the specific locations of committed developments using smaller zones. Nonetheless, the overall growth in trips across the assessed road network is capped to the NTEM forecast level of growth.</p> <p>2.1.18. Details of the schemes and developments listed in the Uncertainty Log can be provided by National Highways if necessary.</p>		<p>traffic forecasts for the optimistic scenario sensitivity testis provided in Appendix A to this submission.</p>
9.69.19	<p>CPRE Comment: 4.2.18 Traffic Forecasts - The prediction of what would happen (the core scenario) without the scheme is based on forecasts from the DfT’s National Trip End Model (NTEM). These overstate the general rate of traffic growth.</p> <p>The National Trip End Model (NTEM) represents the Department of Transport’s centrally agreed position for scheme appraisal as set out in the Transport Analysis Guidance (TAG). National Highways recognises that there is uncertainty with current traffic forecasts. It is for this reason that sensitivity tests of the benefits of the Scheme have been undertaken using both high and low growth traffic forecasts. These sensitivity tests demonstrate that the Scheme is forecast to deliver significant benefits under both the low and high growth</p>	<p>Details of these forecasts have not been supplied. They do alter the value for money for this scheme. Further details are in REP4-016</p>	<p>The high and low growth scenarios have been prepared fully in accordance with the Department for Transport’s (DfT) Transport Analysis Guidance (TAG).</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	scenarios. Also see National Highways' response 3.7 to the Examining Authority's First Written Questions (REP2-021).		
9.69.20	<p>CPRE Comment: 4.2.19 Journey times are misleading and inadequate.</p> <p>2.1.20 National Highways considers that the journey times presented in the Transport Assessment Report are neither misleading nor inadequate. National Highways believes that CPRE has incorrectly assumed that the economic benefits of the Scheme are focused solely on the changes in journey times along these routes and ignores changes in journey times and induced traffic impacts across the rest of the existing network. In reality, the economic assessment of the Scheme includes the journey time impacts along the entire route of every trip within the Area of Detailed Modelling ADM (e.g. from Manchester to Sheffield). It is only trips which don't pass through the ADM (e.g. Sheffield to Sheffield) that are excluded from the economic assessment, as these are not considered material to the assessment of the Scheme.</p>	<p>CPRE did not and does not assume that the times are the basis for the economic appraisal. It is precisely because we did not think they represented the traffic impacts across the network that we asked for the information eventually supplied by NH's consultants.</p> <p>To highlight significant changes in specific journey times, as NH do in the TA, is misleading if these are not reflected in time savings as used for the appraisal. The new analysis of where the benefits actually occur confirms the CPRE view and justifies our data request.</p>	<p>The journey times presented in the Transport Assessment Report (TAR) (APP-185) are intended to give a high-level overview of the changes in journey times due to the Scheme on key strategic routes.</p>
	[See supplementary Note on Traffic Benefits in Insert A at end of this document]		
	EFFECTS ON GHG EMISSIONS		
9.69.21	3.3.5 The applicant was unable to locate the document referenced in the Written Representation (due to redactions), and therefore cannot comment on this methodology. However, it is understood that the Barrett formula is not consistent with National Highways carbon tool as it uses a different reporting mechanism for GHG emissions.	We have included the Barratt formula at the very end of this document for the NH to comment.	Chapter 14 of the ES has been undertaken in accordance with DMRB LA 114. The Applicant has no comment to make on the use of the Barratt formula.
9.69.22	3.6.2 The DfT have advised National Highways that a sensitivity test based on the impact of the policy measures set out in Transport Decarbonisation Plan (TDP) (July 2021) can now be undertaken for schemes. The results of this test along with the updated GH emissions based on EFTv11 has yet to be presented.	We will comment once the results are presented. It will be critical that we (and other IPs) understand what is being proposed and that all the equivalent information to that requested by us is made available in good time so that we can subject it to the appropriate level of scrutiny and produce a proper response. This would include the matrices for traffic, cost changes and public transport. To be compatible with the DfT reduction to net zero, a full walking and cycling matrix would have to be included. This is because the reduction depends on a major increase in	

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7				
		<p>use of these modes through switching from car use and to a lesser extent to rail freight. If the carbon outputs and economics change substantially (which is highly likely) that would mean all the documents submitted at the beginning of the DCO process would be out of date. We would ask for an immediate dialogue with NH on this if they are proceeding with such re-modelling and sufficient time to take into account for what would have to be a revised submission.</p>					
9.69.23	<p>3.8.2 The Applicant would note that the method used for the calculations within 4.4.23(a) (page 46) of the Written Representation is not clear, and therefore cannot comment.</p>	<p>The UK's Nationally Determined Contribution (NDC) commits the UK to reducing economy-wide GHG by at least 68% from the 1990 baseline by 2030. As we expect the transport sector to play its full share in reducing emissions we wanted to show by how much the emissions from the scheme would need to reduce if they too played their full share.</p> <p>Transport emissions in 2019 were 4.6% lower than in 1990. Therefore from 2020 a 63.4% decrease in transport carbon emissions is required to achieve the NDC by 2030. However we did not have the carbon emissions for the DM scenario of the scheme. We used the difference between the carbon emissions in DM in 2025 and DM in 2040 to estimate the annual increments in carbon emissions. We then used the annual increments to work back from the carbon emissions in 2025 to 2019, which gave us an estimate of the scheme's emissions in 2020 - 723,156tCO₂. A 63.4% by 2030 of 723,156tCO₂ would require a reduction in emissions of 458,481tCO₂. Instead with the scheme they increase to 756,232tCO₂.</p>	<p>When considering the impact of the Scheme on operational carbon emissions the Do-Minimum (DM [without Scheme]) data should be compared to the Do-Something (DS [with Scheme]) data for both the opening year (2025) and the design year (2040).</p> <p>Comparing DM and DS data for 2025: 737,485 and 742,808 tonnes carbon dioxide equivalent (tCO₂e) for operational carbon emissions respectively, gives a rise of 5325 tCO₂e, the equivalent of a 0.7% increase in emissions with the Scheme</p> <p>Comparing DM and DS data for 2040: 785,179 and 792,072 tCO₂e for operational emissions respectively, gives a rise of 6893 tCO₂e, the equivalent of a 0.9% increase in emissions with the Scheme</p>				
9.69.24	<p>3.9.4b) Neither Parliament nor Government has identified any sectoral targets for carbon reductions related to transport, or any other sector. There is no requirement in the CCA 2008, or in Government policy, for carbon emissions for all road transport to become net zero. NH quotes <i>R(Transport Action Network) v Secretary of State for Transport</i> [2021] EWHC 2095 (Admin) ("the TAN case")</p>	<p>This is incorrect. Government has identified sectoral targets for transport.</p> <p>The DfT Decarbonisation Plan assigns savings to be made by each mode with a total saving of between 1,307MtCO₂ and 1,797MtCO₂.</p> <table border="1" data-bbox="1139 1633 1703 1904"> <thead> <tr> <th data-bbox="1139 1633 1478 1808">Mode</th> <th data-bbox="1478 1633 1703 1808">Savings MtCO₂e between 2020 and 2050</th> </tr> </thead> <tbody> <tr> <td data-bbox="1139 1808 1478 1904">Increasing walking and cycling</td> <td data-bbox="1478 1808 1703 1904">1-6</td> </tr> </tbody> </table>	Mode	Savings MtCO ₂ e between 2020 and 2050	Increasing walking and cycling	1-6	<p>These are general sectoral targets and are not specific to the roads sector. Our approach compares an inherently cumulative assessment to national budgets, recognising, for example, that there are no legal duties for local authorities to achieve carbon budgets and there is no sectoral level target for transport, nor a baseline. Please refer to the Applicant's response to Issue Hearing 2 Item 6 c) and d) (REP5-026) for a fuller description of the methodology employed here.</p>
Mode	Savings MtCO ₂ e between 2020 and 2050						
Increasing walking and cycling	1-6						

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7												
		<table border="1" data-bbox="1139 436 1703 890"> <tr> <td>Zero buses and coaches</td> <td>35-37</td> </tr> <tr> <td>Decarbonising rail</td> <td>21-22</td> </tr> <tr> <td>Zero emissions fleet cars & vans</td> <td>620-850</td> </tr> <tr> <td>Maritime decarbonization</td> <td>180-230</td> </tr> <tr> <td>Aviation</td> <td>250-430</td> </tr> <tr> <td>Zero emissions freight</td> <td>200-220</td> </tr> </table> <p data-bbox="1715 449 1869 898">The UK's Net Zero Strategy Nov 2021 (which was published after the decision on the TAN case), page 154,</p> <p data-bbox="1115 907 1869 1453">sets targets for each sector including transport. 'Based on our whole system modelling, by 2050, total transport emissions, including international aviation and shipping, could need to drop by 76-86% compared to 2019, down to 23-40MtCO₂e. In the interim, to meet our NDC and CB6 targets, we expect they could fall by 22-33% by 2030 and 46-59% by 2035, compared to 2019 levels. These figures are based on an indicative transport sector pathway contributing to the whole-economy net zero and interim targets. Our potential pathway also indicates residual emissions from domestic transport could need to fall by around 34-45% by 2030 and 65-76% by 2035, relative to 2019 levels (see figure 21). We anticipate that international aviation and shipping emissions could need to fall by up to 12% by 2035, relative to 2019 levels (see figure 22)' .</p>	Zero buses and coaches	35-37	Decarbonising rail	21-22	Zero emissions fleet cars & vans	620-850	Maritime decarbonization	180-230	Aviation	250-430	Zero emissions freight	200-220	
Zero buses and coaches	35-37														
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	GREEN BELT														
9.69.25	<p data-bbox="335 1524 914 1560">National Highways' response to Section 4.1.1 NPPF paragraph 150 (previously 146) sets out development that is appropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, which includes local transport infrastructure which can demonstrate a requirement for a Green Belt location.</p> <p data-bbox="335 1797 1077 1927">4.1.2 CPRE argues that two recent DCO schemes (the A19/A184 Testo's junction and the A19/A184 Testo's junction require a Green Belt location because they are upgrades of existing roads, which is something that</p>	<p data-bbox="1115 1524 1869 1663">The question whether development is appropriate or inappropriate is answered by reference to paras 149 and 150 of the NPPF. For present purposes, there is an important distinction here:</p> <p data-bbox="1115 1680 1869 1919">Some forms of development, such as buildings for agriculture and forestry, are automatically appropriate, irrespective of whether they might have an impact on openness. In such cases, the fact that there would be an impact on openness does not make that development 'inappropriate' and therefore subject to very special circumstances, nor is the impact on openness a</p>	<p data-bbox="1890 1524 2712 1629">National Highways disagrees that there would be "an obvious adverse impact on openness and on the purposes of Green Belt" and has clearly set out its reasoning for this.</p> <p data-bbox="1890 1646 2712 1915">National Highways has not suggested that a development plan policy safeguarding a route for local transport infrastructure overrides para 150(c) of the NPPF or renders the development 'appropriate'. We have merely confirmed the fact that the Tameside UDP is still the main document which is used to determine planning applications for development in the borough and its policies are still in force, including policies T2 and T3.</p>												

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>does not apply to the Scheme. The need for a Green Belt location cannot simply be limited to upgrades of existing roads within the Green Belt (and what is now paragraph 150c of the NPPF does not set such a restriction). This is reflected in NN NPS paragraph 5.171 which recognises that “linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land.”</p> <p>4.1.3. The justification for why the Scheme is local transport infrastructure that requires a Green Belt location is set out in the Case for the Scheme.</p> <p>4.1.4 The Tameside UDP is still the main document which is used to determine planning applications for development in the borough and its policies are still in force, including policies T2 and T3.</p>	<p>legitimate objection to them – by decreeing them appropriate even though they will inevitably affect openness, the NPPF implicitly accepts that impact.</p> <p>Some forms of development <u>can be</u> appropriate, subject to provisos on e.g. size which are not related to impact on openness – e.g. 149(c) (extension or alteration which does not result in a disproportionate addition), 149(d) replacement of a building with another which is not materially larger; 149(e) ‘limited’ infilling. In all of these cases, there will almost invariably be <u>some</u> impact on openness, but once again this cannot render the proposal ‘inappropriate’ or affect the need to demonstrate VSC.</p> <p>Other forms of development can only be ‘appropriate’ if they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. In such cases, impact on openness is an integral part of the decision whether the proposal is inappropriate, and so fundamental to the question whether it is necessary to demonstrate very special circumstances.</p> <p>A road scheme which qualifies as local transport infrastructure falls into category (c) above – see para 150(c) – provided it can demonstrate a requirement for a GB location. As there is an obvious adverse impact on openness and on the purposes of Green Belt then it <u>cannot</u> be appropriate development, and should only be allowed if there are very special circumstances. If it does not impact on openness or purposes, then it could be appropriate – but in that situation, there would be no room for an argument that, even though it was appropriate, it harmed openness and four functions of the GB.</p> <p>There is nothing in the NPPF or the NPSNN which suggests that a development plan policy safeguarding a route for local transport infrastructure overrides para 150(c) or renders the development ‘appropriate’ and thus removes the need to demonstrate very special circumstances. The most that could be said is that the local plan policy is evidence of the importance of the new road, which may be important in demonstrating that very special circumstances exist (see e.g. NPSNN para 5.171). However, that judgment (the balancing exercise</p>	<p>The justification for why the Scheme is local transport infrastructure that requires a Green Belt location is set out in the Case for the Scheme (REP2-016). We welcome CRPE’s recognition that the single carriageway element of the Scheme “<i>could be considered ‘not inappropriate’ in the Green Belt, as it is local transport infrastructure</i>”. However it is our view that the whole of the Scheme is classed as local transport infrastructure under paragraph 150 (c) of the NPPF and we would emphasise that there is nothing in the NN NPS or NPPF that asserts that dual carriageways cannot be local transport infrastructure.</p> <p>There is no definition in the NPPF of what constitutes ‘local transport infrastructure’, but when introducing the reference to ‘local transport infrastructure’ into the NPPF 2012, the Secretary of State, in his Impact Assessment, recognised that as well as the park and ride schemes already (at the time) deemed to be appropriate, “<i>other local transport infrastructure schemes could be beneficial to communities in the Green Belt</i>”. An exhaustive list was not given but examples included (but were not limited to) infrastructure to support more public transport, such as opening new routes. The Impact Assessment noted that “<i>the policy change would enable local infrastructure schemes to be considered in the Green Belt without damaging the principles or protections of the Green Belt.</i>”</p> <p>Whether the scheme delivers local public benefits can therefore be seen as an important aspect of whether it can be considered as local transport infrastructure. As set out in paragraph 7.5.15 of the Case for the Scheme “<i>The Scheme will provide significant benefits to the regional and local transport network. It aids connection between the urban areas of Greater Manchester and South Yorkshire, whilst also supporting journeys between local settlements, including Hattersley, Mottram in Longdendale, Hollingworth and Glossop</i>”. In addition an integrated cycleway network is being delivered as part of the Scheme which provides safer facilities for local cyclists away from the trunk road network. These proposals have been integrated with other cycling schemes being delivered by Tameside MBC and existing facilities. The Scheme’s objectives, as set out in section 3.6 of the Case for the Scheme, inherently relate to delivering benefits to local people.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>which lies at the heart of very special circumstances) is one which has to be made at the time of the decision to grant permission, not at the time the plan was adopted. In the interim, many things may have changed – the need for the road, the extent to which the surrounding area has become built up, the ecological or other importance of the site. All of those things have to be factored in.</p> <p>The scale, extent of the proposed scheme and its inevitable built paraphernalia clearly impacts adversely on 'openness' severing the open landscape with major engineering of the landform, the presence of the built road and signage, lighting and high volumes of vehicles on it, all of which will destroy openness.</p> <p>NH is consistently and erroneously using the term local transport infrastructure to apply to the whole scheme. DCC incorrectly drops the term 'local' from its endorsement of the scheme being appropriate development (REP4-010). The dual carriageway would become part of the Strategic Road Network and is a national significant infrastructure project. It is not local transport infrastructure. The two legal cases are applicable to the dual carriageway part of the scheme as that is clearly an NSIP to which NPPF para 150 makes no reference. NPPF para 150c recognises 'local transport infrastructure which can demonstrate a requirement for a Green Belt location; the single carriageway section could be considered to meet that definition but, as we have explained above, does not fulfil the policy requirements.</p> <p>The Case for the Scheme makes no justification for the scheme being local transport infrastructure. It claims that the Scheme 'does not constitute inappropriate development as:</p> <p><i>It is a regional/local transport development, of approximately two miles, that cannot avoid a Green Belt location'.</i></p> <p>The dual carriageway section of the scheme is neither regional nor local transport infrastructure. It would be part of the Strategic Road Network and is a Nationally Significant Infrastructure Project (NSIP). NPSNN</p>	<p>The existing local problems including congestion, and the local benefits resulting from the Scheme have been recognised in the Local Impact Reports submitted by Tameside MBC, High Peak Borough Council and Derbyshire County Council.</p> <p>The interpretation of the meaning of 'local transport infrastructure' has been considered by various Inspectors and the Secretary of State. For example, the Inspector in the M1 Junction 10a Grade Separation (Luton) decision stated that:</p> <p><i>"The scheme is an NSIP, but not all NSIPs necessarily have national significance in themselves. This scheme's objectives are all local and the improvements must be undertaken at and around the existing junction which lies in the Green Belt. Consequently I regard the scheme as a prime example of local transport infrastructure and accordingly it would not be inappropriate in the Green Belt".</i></p> <p>Clearly the Scheme can be considered a local transport scheme under NPPF paragraph 150 (c). The safeguarding of the scheme route in the Tameside UDP lends further weight to the scheme being local transport infrastructure, in line with the approach taken by the Inspector in the A19 / A184 Testo's Junction Alteration DCO. In that case the Inspector considered that <i>"the Development Plan proposal support provided for the Proposed Development through a site allocation establishes that it is 'local transport infrastructure which can demonstrate a requirement for a Green Belt location'"</i>, and the Secretary of State agreed with this reasoning, finding that that scheme was <i>"not an inappropriate development on Green Belt land for which a very special circumstances case would need to be considered"</i></p> <p>We agree with CPRE that <i>"there is no presumption that a policy becomes out of date simply because a development plan is long in the tooth or has not been reviewed within the promised period"</i>.</p>

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		<p>5.178 identifies that ‘when located in the Green Belt national networks infrastructure projects may comprise inappropriate development’</p> <p>Turning now to the question of the legitimacy of the TMBC UDP. This is not a question of law, but one of fact-sensitive judgment, where the answer will vary depending on the particular case. While it is true that the older an existing plan is, the easier it may be to draw the inference that it is out of date, there is no presumption that a policy becomes out of date simply because a development plan is long in the tooth or has not been reviewed within the promised period. In the case of a safe-guarding policy, unless and until it becomes clear that a proposal has been abandoned/is highly unlikely to be delivered/has been delivered in a different way which no longer requires the safeguarded land, a safeguarding policy is still something to which weight can be attached. This is not necessarily a binary issue – between full weight and no weight there is a spectrum, and the ultimate decision may lie somewhere between the two. As we have suggested above many things have changed since 2004 and consequently the safeguarding policy carries little weight, as follows.</p> <p>The TMBC UDP was adopted before the legal duty on local authorities to include policies on climate change mitigation and adaptation in Development Plan documents came into effect. It therefore predates the requirement of s.182 of the Planning Act 2008 Planning. ‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’. As a consequence it fails to meet a number of NPPF policies with respect to climate change mitigation and adaptation.</p> <p>In 2008 the Climate Change Act (amended 2019) set a target for reduction of GHG emissions to Net Zero.</p> <p>A climate emergency has been declared by national government and regional and local authorities.</p> <p>The imperative of addressing climate change requires a reduction in vehicle kilometres not an increase in road</p>	

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>capacity for more vehicle kilometres (Climate Change Committee UK 6th Carbon Budget).</p> <p>Climate change and the increasing frequency of severe weather incidents requires avoidance of flood risk sites, such the River Etherow flood plain.</p> <p>The need for the road can be met in other ways as our alternatives demonstrate.</p> <p>There is an ecological crisis which means policies must be strengthened to safeguard nature, not as required by the Environment Act 2022.</p> <p>Physical inactivity leading to obesity and premature death has emphasised the importance of active travel, reducing car dependency and improving access to local green space, all which this scheme would work against.</p> <p>When all these are factored in, the UDP safeguarding policy carries little weight.</p>	
9.69.26	<p>4.2 National Highways’ response to Section 4.6 ‘The Scheme Conflicts with the Purposes of the Green Belt’</p> <p>4.2.1 The Applicant has set out in the Case for the Scheme (REP2-016) why it considers the Scheme does not conflict with the purposes of the Green Belt.</p> <p>4.2.2 with regards to NPPF para 138 part a) ‘checking the unrestricted sprawl of large built-up areas’ and b) ‘preventing neighbouring towns merging into one another’, National highways would highlight that pressure for developing land in the Green Belt on the edge of existing settlements exists regardless of the Scheme and revisions to the Green Belt to release land for development can only take place through the Local Plan process; previously proposed allocations or site submissions by private landowners as part of this process are not relevant to the consideration of the Scheme and there are no allocations in the emerging Places for Everyone Plan.</p> <p>4.2.3. Policy OL3 of the Tameside UDP is not a general policy authorising infill but relates to minor expansions of certain specific named existing sites within the Green Belt, none of which are within the boundary of the DCO.</p>	<p>A major road scheme WILL create a new logical boundary to the urban areas. The pockets severed from open countryside and adjacent the built up area will no longer be easily defensible from development.</p> <p>Contingent on NH’s proposed development Savills, on behalf of Crossways Commercial Estates, are proposing a new sustainable urban extension (SUE) of 600-700 houses. The SUE would extend Hollingworth into a 27ha triangle of Green Belt between Woolley Lane, Mottram Moor and the proposed single carriageway to Glossop. Savills is requesting adjustments to the River Etherow crossing to enhance its proposed SUE and that the SUE is considered as part of the DCO application. This is strong evidence that the scheme would impair the first two functions of the Green Belt as listed in NPPF – checking unrestricted sprawl and preventing neighbouring towns merging.</p> <p>[We note that in REP3-020 although NH refused the adjustments to the River Etherow bridge it did not comment on consideration of the SUE as part of the DCO.]</p>	<p>National Highways maintains its position that pressure for developing land in the Green Belt on the edge of existing settlements exists regardless of the Scheme and revisions to the Green Belt to release land for development can only take place through the Local Plan process; previously proposed allocations or site submissions by private landowners as part of this process are not relevant to the consideration of the Scheme and there are no allocations (including the SUE mentioned by CPRE) in the emerging <i>Places for Everyone</i> Plan.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>The nearest, Longdendale Community High School lies to the north-east of the Scheme. Notwithstanding the status of OL3, the NPPF (paragraph 149) sets out that limited infilling or the partial or complete redevelopment of previously developed land can be appropriate development in the Green Belt. The NPPF allows for infilling in certain circumstances with or without the Scheme. Likewise, as quoted by the CPRE (page 63), there will be pressure for residential development due to Mottram being an attractive place to live, not as a result of the construction of the Scheme.</p>	<p>NPPF 2021, para 149 states A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.</p> <p>Exceptions to this include limited infilling in villages; and limited infilling or the partial or complete redevelopment of previously developed land. Without the scheme there would be no pockets for ‘limited infilling’, therefore the scheme harms the function of the Green Belt in this location.</p>	<p>Development of land between the built up area and the new road would not likely be considered “limited infilling” as envisaged by paragraph 149 of the NPPF. Planning permission would still need to be granted for any infill development under paragraph 149 of the NPPF and would not likely be forthcoming, especially as the land lies outside the existing settlement boundaries.</p>
9.69.27	<p>4.2.4. With regards to page 63 part c) In addition to comments on encroachment within the Case for the Scheme, according to the Local authority green belt statistics for England: 2020 to 20213 Tameside possesses over 5,000 hectares of land designated as Green Belt whilst High Peak has nearly 4,000. As the CRPE themselves agree in their deadline 3 submission in terms of total Green Belt area, the Scheme area is small. The impact of the Scheme on habitats, wildlife and flood risk is covered elsewhere within the relevant chapters of the submitted Environmental Statement.</p>	<p>The actual size of the scheme and the area of Green Belt land take is not the issue. The scheme must be tested against the Green Belt policies in NPSNN 2014 and NPPF 2021.</p>	<p>The Scheme is compliant with Green Belt policies in the NPPF and NN NPS.</p> <p>In their Deadline 5 Submission - Post-hearing submission requested by the Examining Authority - Comments on Issue Specific Hearing 2 Items (REP5-031), Tameside MBC, responding to the Examining Authority’s question “do the local authorities have any comments on the Applicant’s consideration of temporary works, openness, or whether the Proposed Development would constitute inappropriate development?” confirm that they “agree with the applicants approach.” High Peak Borough Council, in their post-hearing submissions (REP4-011 and REP5-035) have not raised any concerns in response to this question. In their Deadline 6 submission, in response to question 5.14 High Peak Borough Council (REP6-027) have responded “no further comments”.</p> <p>Tameside MBC in their response to second written question 5.12 (REP6-037) submitted at Deadline 6 state that they have “no further concerns at this stage” albeit noting this is dependent on further information from the applicant.</p>
9.69.28	<p>4.2.5. With regards to page 64 part d) The Scheme’s impact on the setting of the Conservation Area has been properly considered within Chapter 6 of the ES: Cultural Heritage</p> <p>4.2.6 With regards to page part e) There is not a requirement to demonstrate how the Scheme would</p>	<p>The impact of the scheme on the Conservation Area may have been ‘properly considered’ but that does not alter the result - the adverse effect. NH is only partly correct to state that ‘The value of the conservation area derives from its architectural and historic interest as a settlement preserving evidence of development from the</p>	<p>The assessment of impacts on Mottram-in-Longdendale Conservation Area has considered both the significance of the conservation area, and the contribution of setting to this significance, as set out in the cultural heritage desk-based assessment (REP1-033) and Chapter 6 of the Environmental Statement (REP6-005). It is of note that the setting of the</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>assist in urban regeneration. We set out how the Scheme does not conflict with this purpose in the Case for the Scheme.</p>	<p><i>medieval period to the post-medieval period.</i> The landscape setting is also of value – the inclusion of the rough pasture to the east of the village is an integral part of the setting of the village. As NH notes in ES Ch. 6,6.7.29-6.7.32 <i>‘The setting of Mottram-in-Longendale Conservation Area (HA2) and its relationship to the surrounding landscape at the edge of the Pennines would be permanently altered by the presence and operation of the Scheme. The A57 Link Road and Mottram Back Moor Junction would form a new feature within the setting of the conservation area to the north-east which, together with the lighting of the Link Road, would diminish the open, agricultural character of the conservation area’s setting in this area.’</i></p> <p>The scheme would form an intrusive feature in mid-range views from the Conservation Area. As one would be looking downhill to the west of the scheme the visual impact from here would not, as NH claims, be reduced by the presence of a false cutting on the south side of the proposed development and woodland planting - there is no planting that would mature and screen the dual carriageway as it approaches Mottram Moor or the new Mottram Moor junction. The Pennine Hills are but one element of the setting of the Conservation Area; the green open space of the east of it that the scheme would destroy as also integral to it. Views From Mottram Moor into the Conservation Area and in particular towards St Michael and All Angel’s Church, currently screened by roadside vegetation, would be abruptly interrupted by the huge Mottram Moor Junction. To the north west of the Conservation Area the dual carriageway would intrude on long views from the area of Edge Lane towards the church tower, diminishing its landmark role in these views. Therefore the scheme does not preserve the setting and special character of the historic town Mottram.</p>	<p>conservation area is not of value in and of itself, but contributes to the value, character and appearance of the conservation area.</p> <p>The impact of the cutting on views from the north-east of the conservation area is recognised at paragraph 6.7.30 of the Environmental Statement, where it is stated that this would form a noticeable element in views northwards from open land to the east of the conservation area. Over time, the proposed landscape planting along the cutting will aid its integration into the surrounding landscape, and reduce its prominence in these views. The statements with regards to the mitigating effect of the false cutting and planting referred to in the response from CPRE relate to the scheme as it continues to the east of Mottram Moor Junction, where these measures will reduce the visual impact of the proposed road in views from the conservation area.</p> <p>The rural character of the conservation area’s setting to the north and east will continue to be understood during operation of the Scheme. While the Scheme will introduce a new element of highway infrastructure into this setting, the Scheme will form a linear element within this rural landscape, rather than destroy it. As identified at paragraph 6.7.30 of the Environmental Statement, over time, planting will reduce the visual impact of the Scheme and aid its integration with the surrounding landscape. The impacts on views into the conservation area from Mottram Moor and Edge Lane are acknowledged and identified at paragraph 6.7.30 of the Environmental Statement, along with the current screening of views from Mottram Moor by vegetation.</p> <p>As identified at paragraph 5.135 of the National Policy Statement for National Networks, assessment of impacts on a conservation area should take into account the relative significance of affected elements and their contribution to the significance of the conservation area as a whole. The views from open land to the north of the Church of Michael and All Angels, Mottram Moor and Edge Lane are among several views which contribute to the significance of the conservation area. While the Scheme will form an intrusive feature in these views, on balance, the rural character of the conservation area’s setting and its relationship to the surrounding Pennine hills will continue to be understood. It is of note that the Mottram Moor junction is located outside the designated area,</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
			<p>within a dip in the landscape, screened from the core of the conservation area, and key streetscapes such as Market Street and Church Brow.</p> <p>Under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, conservation areas are designated due to their <i>'special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'</i>. While the setting of and views into and out of the conservation area contribute to its special interest, much of its special interest is derived from the fabric and form of the settlement itself. The Scheme will result in a substantial reduction of traffic levels along the existing A57 within the conservation area, substantially reducing noise and visual intrusion along the trunk road, improving the settings of historic buildings along Mottram Moor and Hyde Road, and improving the character and appearance of the conservation area. The views and elements of setting which will be impacted by the proposed Scheme contribute less to the significance of the conservation area than the asset itself.</p> <p>On balance therefore, it is considered that while the Scheme would result in adverse effects on the conservation area in relation to its setting around Mottram Moor and views from Edge Lane, there would also be a beneficial effect on the appearance and character of the conservation area during operation brought about by the substantial reduction in traffic on the A57 and associated reductions in noise and visual intrusion within the conservation area.</p>
	<p>4.3. National Highways' response to Section 4.6 'The Scheme Harms the Openness of the Green Belt'</p>		
9.69.29	<p>4.3.1 Green belt is not a visual or landscape designation and does not imply any particular visual or landscape quality requirement. The key to Green Belt is its openness and preventing urban sprawl.</p> <p>4.3.2 The openness of the greenbelt (or any land) is not directly related to the height of a feature or element within or across it. For example, Uluru (Ayer's Rock) does not necessarily affect openness and indeed, can enhance the perceptual experience of openness.</p>	<p>NH fundamentally misunderstand the meaning of openness in planning case law in their Uluru comparison. What they say is nonsense. Uluru is a natural open feature in its own right, and as part of its surrounding countryside. It is part of the 'openness' just as the Peaks of the Peak District are. Openness includes features which block views. A new major modern road construction is neither open nor a natural feature. It may be possible to mitigate a little of its impact by careful design and landscape but unless it was put underground openness will be clearly harmed.</p>	<p>Please see National Highways response to Second Written Question 5.11 (page 50, REP6-017) and 9.64 'Environmental Masterplan Overview (REP6-020) which demonstrates the landscape fit balances openness and alignment with landscape character.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>4.3.3 The elements of the landscape design comprise principally of landform and planting which have been carefully designed to ensure that the scheme is both screened from sensitive receptors and integrated into the local landscape character with both open and enclosed sections. This will deliver a blend of screened highway and more open views. The landform enclosing the road is largely as a false cutting and this combined with the undulating nature of the wider landscape, means views of the route will be limited and also seen within the context of a wider landscape setting of rising hills and moorland slopes. The design is a combination of various influences - visibility, landscape character biodiversity and habitat creation as well as drainage considerations</p> <p>4.3.4 In summary it is considered that the openness of the green belt is not compromised by the addition of the Scheme.</p>		
9.69.30	<p>4.4 National Highways’ response to Section 4.6 ‘Very special circumstances’ do not exist to outweigh the harm’</p> <p>4.4.1 National Highways disagrees and consider that, should the Scheme be considered inappropriate development, there are very special circumstances that outweigh the harm in line with paragraph 148 of the NPPF. Furthermore, we consider that harm has been appropriately assessed as set out in our response to the Examining Authority’ s First Written Question 4.2 (REP2-021).</p>	<p>We have responded to NH’ s answer to the Examiner’ s First Written Questions 4.2 in REP3-031 p13. In its answer NH argues that as the scheme is not inappropriate development it <i>‘is not burdened by the presumption against inappropriate development and need not demonstrate very special circumstances nor engage in a weighing exercise of harm against such circumstances and any other considerations in favour of granting permission’</i></p> <p>The single carriageway could be considered ‘not inappropriate’ in the Green Belt, as it is local transport infrastructure. However NPPF para 150 is clear that development that is not inappropriate has to preserve the openness of the Green Belt and not conflict with the purposes of the Green Belt. The single carriageway, like the dual carriageway, does not preserve openness, and conflicts with four of the five purposes, of the Green Belt. It is therefore inappropriate development and therefore very special circumstances apply</p>	<p>National Highways has explained why the Scheme as a whole maintains openness and does not conflict with the purposes of the Green Belt, including most recently in its answers to the Examining Authority’s Second Questions.</p>
	AIR QUALITY		
9.69.31	5.2.1-5.2.5 Omission of AQMAs	We remain unconvinced by NH’ s arguments. The extraordinary traffic flows modelled through both of	Please refer to National Highways’ response to Examining Authority's Second Written Question 7.5 a, b and d in relation

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>Glossopdale's AQMAs continues to be unexplained. It is these modelled changes in traffic that have led to NH concluding that the AQMAs do not need to be assessed. HPBC is also seeking further information for the rationale of the diversion onto Shaw Lane and Dinting Road in order to avoid the Dinting Vale AQMA (REP4-011). Therefore until these forecast anomalies are explained we remain unconvinced. HPBC elaborates on its reasons for concerns about modelling and methodology in REP4-011. We will respond when we have seen NH's response to these.</p>	<p>to the scoping out of roads within Tintwistle AQMA and the majority of roads within Glossop AQMA (REP6-017). Please refer to National Highway's response to Examining Authority's Second Written Question 7.4 in relation to the routing of traffic in Glossop (REP6-017).</p>
9.69.32	5.2.7-5.2.10 Omission of particulate matter	<p>We maintain that the air quality assessment should take a precautionary approach and use the lower levels of exceedances of pollutants that are now being used by GMCA and WHO. There are no safe limits for PMs.</p>	<p>National Highways has no further comment to make.</p>
9.69.33	5.2.11-5.2.12 no recognition of local and regional targets	<p>The EIA regs require assessment against regional and local targets.</p>	<p>National Highways has no further comment to make.</p>
9.69.34	5.2.13 Effects on air quality in 2040 omitted	<p>In 2007 the Highways Agency (now NH) forecast that by 2015 with or without the Mottram-Hollingworth-Tintwistle Bypass there would be no exceedances of NO₂. Yet here we are in 2022 with severe exceedances persisting, because the forecast was wrong. The assumption that vehicle technology would solve air pollution has proved to be hollow.</p> <p>The same may apply to today's assumptions - EVs may not solve air pollution or may be so delayed in their uptake that air pollution impacts continue</p>	<p>The opening year of 2025 is expected to be a worst case for air quality given reductions in vehicle emissions and background concentrations due to the shift to electric vehicles with the Government's commitment to end the sale of new petrol and diesel cars and vans from 2030, and the plan to end sales of new diesel HGVs from 2040. National Highways believes that the national DfT projections for fleet composition and Defra vehicle emissions projections used provide a robust assessment of the impacts on local air quality based on the latest available data at the time of assessment.</p>
9.69.35	Air Quality Directive	<p>We have read NH's response to the ExA's questions on Tintwistle AQMA (see and ff). <i>'Where there is an overlap between the ARN and the PCM model just to the west of New Road the compliance risk assessment modelling results (e.g. receptors QF917 and QF920, which are the closest included in the modelling to Tintwistle) 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 AQS objective/Limit Value and as such there would not be a non-compliance with the Air Quality Directive. This is for a location within the ARN where the traffic DMRB LA 105 traffic change criteria are exceeded, so by extension</i></p>	<p>The A628 west of New Road is included in the air quality affected road network due to a speed band change. AADT changes do not meet the relevant traffic change criterion. Although the expected change to AADT is higher on the section of A628 to the east of New Road the total flows are higher on the A628 west of New Road. In addition, both receptors QF920 and QF917 are located immediately to the east of the junction with New Road, the assessment results therefore reflect the change in concentrations as a result of the emissions on the section of the A628 east of New Road. The total annual mean concentration in the Do Something scenario at QF920 and QF917 are expected to be 15.9 µg/m³ and 14.6 µg/m³ respectively (calculated with the Defra method which is used to determine compliance with the Air</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>for Tintwistle which is not within the ARN there would also not be a non-compliance with the Air Quality Directive.’ However the AADT for DM/DS west of New Road ie in Hollingworth are 15,950 and 15,900 respectively. Therefore this section of the road does not meet the trafficchange criteria of 1,000 AADT, and this is not a convincing argument.</p> <p>The Tintwistle AQMA must be assessed.</p>	<p>Quality Directive), which is less than half the limit value of 40 µg/m³, and as such there would not be a risk of non-compliance with the Air Quality Directive on either section of the A628.</p>
	LANDSCAPE EFFECTS		
9.69.36	<p>Landscape effects</p> <p>6.2.3 With reference to the Greater Manchester Landscape Character and Sensitivity Assessment that accompanies the <i>Places for Everyone Joint Plan</i>, the Applicant has used landscape character assessments that are appropriate in the LVIA produced. The CPRE has 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>Tameside MBC in response to the ExA FWQs regarding omissions of policy documents proposes the use of The Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA) that accompanies Places for Everyone. Places for Everyone Joint Development Plan Document is a material consideration for the Examination as it has been submitted to the Secretary of State for examination on 14 February 2022.</p> <p>GMLCSA is a material consideration for the Examination as it is the most recent assessment (2018) and postdates all other assessments - the PDNPA dates from 2009 and HPBC/DCC dates from 2003 revised 2013. Tameside MBC does not have a Landscape Character Assessment, therefore the GMLCSA provides the relevant perspective and should be used as the most up-to-date baseline to consider the effects of the scheme.</p> <p>NH has quoted us out of context and appears to have misunderstood what we have done. Our REP2-069 para 4.7.2 states ‘<i>The scheme lies within two coincident landscape character areas (a) National Character Area Profile (NCA) 54 Manchester Pennine Fringe, the transitional zone between the open moorlands of the Dark Peak and Southern Pennines, and the densely populated conurbation of Manchester; (b) the Dark Peak Western Fringe (DPWF) Landscape Character Area (LCA) as defined by the PDNPA. NH has divided these two landscape character areas into scheme level LCAs (SLLCA) and townscape character areas (SLTCA). We will also refer to the Greater Manchester Landscape Character and Sensitivity Assessment that accompanies the Places for Everyone Joint Plan 228 (August 2018)</i></p>	<p>Please refer to National Highways response to the Examining Authority’s second written question 5.1 where a comparison of the GMLCSA and the assessments used in the ES Chapter 7 is set out. That summary states that 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.</p> <p>In response to the matter of addressing and including the effects on individual elements, or features, or specific aesthetic or perceptual effects, the Scheme Level landscape Character Areas (SLLCAs) and Scheme Level Townscape Character Areas (SLTCAs) provide detail of the elements and features, including the perceptual aspects, of the landscape relevant to the Scheme.</p> <p>For example, during the construction phase (ES Chapter 7 Landscape and Visual Effects (REP6-006), Table 7.26), SLLCA1 refers to the hedgerow and mature boundary vegetation and the existing fields south of Edge Lane. SLLCA 3 refers to the small intimate scale, to tranquillity and to the distinctive features of woodland and hedgerows, It also makes explicit reference to Mottram Showground in terms of the public perception of landscape value. SLLCA 4 refers to the features including hedgerows, woodland groups, footpaths and the peripheral urban areas and A57. SLTCA3 refers to the historic mature woodland belt on the eastern edge. SLTCA 5 to the loss of a stable building, trees and hedgerow.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>that NH has ignored. Assessment using all these LCAs and LCT is substantially the same but with some subtle differences which will become apparent. Para 4.7.4 goes on to say ‘NH has used Landscape Designations and Landscape Character Types (Table 7.28) as landscape receptors, which is acceptable for overall character but does not address the effects on individual elements, or features, or specific aesthetic or perceptual effects. To address this omission we have spelt out important individual elements. ‘</p> <p>Finally the Table on p76 then showed how we had assessed the impacts of the scheme within the same framework as NH but came to different conclusions.</p> <p>It is clear that we have used the same GLVIA 3 methodology as NH and the same LCA and LCTs but also included the GMLCSA. The latter makes a more robust defence of the landscape and for its future enhancement to the earlier assessments. It is to that that our substantially the same but with some subtle differences refers. GLVIA requires baseline studies of landscape to identify and describe the elements that make up the landscape, the aesthetic and perceptual aspect of the landscape and the overall character of the landscape in the study area. Our assessment attempts to supply the important detail missing from NH’s assessment as presented. The PDNPA has expressed the same concern about using LCAs as landscape receptors.</p>	<p>Similarly, during the operation phase (ES Chapter 7, Landscape and Visual Effects (REP6-006), Table 7.27), SLLCA1 details the specific footpath elements affected, and refers to woodland, hedgerow and fields. It also recognises that Harrop’s Edge was specifically mentioned in the public perception of landscape value. An example from SLLCA3 demonstrates the specific details typically included “<i>distinctive landscape features (woodland and tree lined hedgerows), which are important in defining the scale of the landscape. This loss includes woodland on the edge of the adjacent Mottram Spout Green (SLTCA 3) within the footprint of the Scheme. This is a defining feature within the landscape and enhances the intricacy of this landscape by sheltering it from neighbouring built form</i>”. It also specifically refers to the Mottram Showground being mentioned in the public perception of landscape value. For SLTCA 3 the linear historic character along Old Road is specifically mentioned as is defining mature vegetation along the eastern boundary.</p> <p>Therefore, National Highways considers that the assessment demonstrates consideration of individual elements and is compatible with GLVIA3 guidance and the DMRB LA107 and LA104.</p> <p>National Highways makes no comment on the assessment undertaken by CPRE.</p>
9.69.37	<p>In reference to not addressing the effects on individual elements, or features, or specific aesthetic or perceptual effects, Tables 7.26 and 7.27 list the key characteristics and refer to the landscape elements and features, and perceptual qualities where applicable, in discerning the magnitude of change. In addition, landscape elements and features are considered throughout ES Chapter 7: Landscape and Visual Effects (REP2-007) as follows:</p> <p>Paragraph 7.3.7: Elements and features which are key contributors to landscape character such as woodlands, distinctive individual trees, rural lanes, watercourses, and the overall landscape area.</p>	<p>In Tables 7.26 and Table 7.27 NH has listed the key characteristics of relevant NCA, LCAs and LCTs and then assessed the magnitude of the impact of the scheme on these. That has been done without identifying the specific key elements of that particular landscape or presenting their individual importance. The description repeats the key characteristic from the list and could be used as a template for a development anywhere within these LCAs and LCTs. We made it clear in REP2-069 that we believed NH’s assessment was suitable for assessment at the level of landscape character but was inadequate to capture the impacts on individual features and elements. GLVIA requires</p>	<p>Please refer to response for the matter above which provides examples of how the assessment demonstrates consideration of individual landscape elements and is compatible with GLVIA3 guidance and the DMRB LA107 and LA104. These are found in column two of Table 7.26 and 7.27. Column one lists the key characteristics which are repeated for convenience to save the reader having to refer back to previous sensitivity tables.</p> <p>National Highways makes no comment on the assessment undertaken by CPRE.</p> <p>With regards to the specific paragraphs mentioned:</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>Paragraph 7.3.9: The assessment of landscape effects including the change or removal of key existing landscape features e.g. prominent existing individual mature trees or change to a watercourse.</p> <p>Paragraph 7.6.4: Landscape Baseline identifies individual landscape receptors including designations, landscape character, land use, elements and features, and settlement and built elements. Elements and features are generally limited to those within the Draft Order Limits.</p> <p>Paragraphs 7.6.11 and 7.6.12 refers to detailed tree surveys undertaken. Paragraph 7.6.13 to Ancient Woodland which is all outside the DCO limits.</p> <p>Paragraphs 7.6.14 discusses field boundaries. Paragraph 7.6.21 considers Melandra Castle.</p>	<p>baseline studies of landscape to identify and describe the elements that make up the landscape, the aesthetic and perceptual aspect of the landscape and the overall character of the landscape in the study area. Our assessment attempts to supply the important detail missing from NH's assessment as presented.</p> <p>7.3.7 is not addressing specific landscape features.</p> <p>3.3.9 is a description of the methodology not of the features.</p> <p>7.6.4 refers to elements non-specifically.</p> <p>7.6.11-7.6.12 refers to trees woodlands and ancient woodlands and refers to the Arboricultural Impact Assessment Report 7.3. The latter is a thorough ecological assessment of individual trees but their importance and significance in the landscape is not addressed.</p>	<p>Para 7.3.7 of the ES states Landscape receptors with the potential to experience change as a result of the Scheme comprise the elements and features of the landscape which are key contributors to the local landscape character (such as woodlands, distinctive individual trees, rural lanes or watercourses) and the overall landscape character area. An understanding of the direct physical effects of the Scheme on landscape elements and features informs the assessment of the significance of the overall effect on landscape character.</p> <p>There is no para 3.3.9 within the landscape chapter.</p> <p>Para 7.6.4 is an introductory paragraph to the baseline section; it is not intended to be exhaustive. It states '<i>This section identifies the landscape receptors and any designated or protected areas. It focuses on landscape and landscape related designations, landscape character, land use, landscape elements and features and settlement and built elements. Landscape features and elements that would potentially be affected by the Scheme are generally limited to those that lie within the Draft Order Limits.</i>'</p> <p>The individual trees and woodland including those covered by TPOs are shown in Figure 2.4 Environmental Masterplan, which has informed the landscape and visual assessment with regards to trees and woodland retained or those lost.</p>
9.69.38	<p>Landscape effects</p> <p>6.2.11 The Applicant notes that a separate methodology is relied upon for the CPRE assessment, as per 4.7.7 through to 4.7.27 (REP2-069) (pages 72-78), of the Written Representation and this is not clear (in terms of its relevance and basis), and therefore cannot be commented on.</p> <p>6.2.12. As per ES Chapter 7, Para 7.3.3 'A detailed landscape and visual assessment has been undertaken following the requirements of the DMRB LA 107 standard. The assessment is also informed by guidance set out in GLVIA3 and GLVIA3 Statements of Clarification.'</p> <p>6.2.13. Additionally, as per para 7.3.5 'The assessment was undertaken by two chartered Landscape Architects (LA's) experienced in LVIA and their professional judgement was used in line with GLVIA3.'</p>	<p>NH has quoted us out of context and appears to have misunderstood what we have done. Our REP2-069 para 4.7.2 states</p> <p><i>'The scheme lies within two coincident landscape character areas (a)</i></p> <p><i>National Character Area Profile (NCA) 54 Manchester Pennine Fringe, the transitional zone between the open moorlands of the Dark Peak and Southern Pennines, and the densely populated conurbation of Manchester;</i></p> <p><i>(b) the Dark Peak Western Fringe (DPWF) Landscape Character Area (LCA) as defined by the PDNPA. NH has divided these two landscape character areas into scheme level LCAs (SLLCA) and townscape character areas (SLTCA). We will also refer to the Greater Manchester Landscape Character and Sensitivity Assessment that accompanies the Places for Everyone Joint Plan 228 (August 2018) that NH has ignored.</i></p>	<p>National Highways makes no comment on the assessment undertaken by CPRE. The Applicant would, once again, refer to our response for the matter above which provides examples of how the assessment demonstrates consideration of individual landscape elements and is compatible with GLVIA3 guidance and the DMRB LA107 and LA104. This response demonstrates that we do not consider the detail to have been provided and considered in the assessment.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
		<p>Assessment using all these LCAs and LCT is substantially the same but with some subtle differences which will become apparent.</p> <p>Para 4.7.4 goes on to say ‘NH has used Landscape Designations and Landscape Character Types (Table 7.28) as landscape receptors, which is acceptable for overall character but does not address the effects on individual elements, or features, or specific aesthetic or perceptual effects. To address this omission we have spelt out important individual elements.’</p> <p>Finally the Table on p76 of REP2-069 then showed how we had assessed the impacts of the scheme within the same framework as NH but came to different conclusions.</p> <p>It is clear that we have used the same GLVIA 3 methodology as NH and the same LCA and LCTs but also included the GMLCSA. The latter makes a more robust defence of the landscape and for its future enhancement than earlier assessments of LCAs and LCTs. It is to that that our ‘substantially the same but with some subtle differences’ refers. GLVIA requires baseline studies of landscape to identify and describe the elements that make up the landscape, the aesthetic and perceptual aspect of the landscape and the overall character of the landscape in the study area. Our assessment attempts to supply the important detail missing from NH’ s assessment as presented. The PDNPA has expressed the same concern about using LCAs as landscape receptors.</p>	
9.69.39	<p>Townscape effects</p> <p>The Applicant notes that a separate methodology is relied upon for the CPRE Townscape assessment, as per 4.7.28 through to 4.7.47 (REP2- 069) (pages 79-82), of the Written Representation and this is not clear (in terms of its relevance and basis) , and therefore cannot be commented on.</p> <p>6.2.15. As per ES Chapter 7: Landscape and Visual Effects, Paragraph</p> <p>7.3.3 of the Environmental Statement ‘A detailed landscape and visual assessment has been undertaken</p>	As above - CPRE followed the GLVIA3	National Highways has no comment on the assessment undertaken by CPRE.

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>following the requirements of DMRB LA 107 standard. The assessment is also informed by guidance set out in GLVIA3 and GLVIA3 Statements of Clarification.’</p> <p>6.2.16. Additionally, as per ES Chapter 7: Landscape and Visual Effects, Paragraph 7.3.3 of the Environmental Statement per para 7.3.5’ ‘The assessment was undertaken by two chartered Landscape Architects (LA’ s) experienced in LVIA and their professional judgement was used in line with GLVIA3.’</p>		
9.69.40	<p>Visual Effect</p> <p>6.2.17 The Applicant notes that a separate methodology is relied upon for the CPRE visual assessment, as per 4.7.48 through to 4.7.50 (REP2-069) (page 82), of the Written Representation and this is not clear (in terms of relevance and basis), and therefore cannot be commented on.</p> <p>6.2.18. As per ES Chapter 7: Landscape and Visual Effects paragraph</p> <p>7.3.3 ‘A detailed landscape and visual assessment has been undertaken following the requirements of DMRB LA 107 standard. The assessment is also informed by guidance set out in GLVIA3 and GLVIA3 Statements of Clarification.’</p> <p>6.2.19. Additionally and as per ES Chapter 7: Landscape and Visual Effects Paragraph, Paragraph. 7.3.5: ’ The assessment was undertaken by two chartered Landscape Architects (LA’ s) experienced in LVIA and their professional judgement was used in line with GLVIA3.’</p>	<p>As above CPRE followed the guidance set out in GLVIA3. In our view NH’ s assessment did not fully capture or describe, and underplayed, the visual effects of the scheme.</p>	<p>National Highways makes no comment on the assessment undertaken by CPRE. National Highways considers that the visual effects have been determined following assessment which complies with the relevant guidance and standards for road infrastructure schemes of this nature and provide a transparent and robust visual assessment.</p>
	EFFECTS ON PEAK DISTRICT NATIONAL PARK		
9.69.41	<p>Increased Noise and reduced tranquillity</p> <p>4.8.19: Paragraphs 11.3.34 and 11.3.35 of the Noise chapter of the ES (REP1-017, REP3-007) provide details on how roads from the traffic model are selected for inclusion in the operation phase road traffic noise assessment. A map showing the locations of the roads within the study area of the Scheme is provided in</p>	<p>We have responded to NH’ s approach towards tranquillity and dark skies in our submission for Deadline 4 REP4-016.</p>	<p>National Highways has no further comment to make.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>Figure 11.5 (APP-134), which includes the A57 and A628. Traffic data from other roads located within the Peak District National Park were analysed for inclusion in the assessment, however, they did not meet the DMRB LA 111 requirements for inclusion in the study area as there were not predicted to change by 1 dB or more. Changes of less than 1dB are classified as negligible in the DMRB and would not be perceptible.</p> <p>7.2.2. 4.8.20: Paragraph 11.9.97 of the Noise chapter of the ES (REP1- 017, REP3-007) states that minor increases were predicted on the A57 (Sheffield Road, Woodcock Road, Snake Pass and Snake Road) in the short-term and would be perceptible, and that negligible impacts would occur in the long-term. The impact magnitudes stated are based on the DMRB LA 111 assessment criteria reproduced in Table 11.9 of the ES.</p> <p>This would result in a significant adverse effect to 44 dwellings in Glossop (Sheffield Road and Woodcock Road) due to existing noise levels exceeding the significant observed adverse effect level. No significant effects would occur to footpath users at Snake Road/Snake Pass, although the noise changes at sections of footpath close to these roads would be perceptible.</p> <p>7.2.3. The italicised text “The impact would be limited to within approximately 10 m of the road” was identified as errata and has been removed from reissued versions of the Noise chapters (REP1-017, REP3- 007).</p>		
9.69.42	<p>Wildlife Impacts</p> <p>Operational impacts upon biodiversity, which have been highlighted by CPRE (such as lighting, noise, and roadkill) have been assessed within Chapter 8 of the ES with mitigation measures provided as required. For example, closed-border fencing, acoustic fencing and badger proof fencing has been provided across the majority of the Scheme adjacent to the highway which will prevent ground-based terrestrial mammal species such as deer, badgers, and hedgehog from entering the road, and thus, reducing roadkill and providing noise screening. Furthermore, the lighting scheme has been specifically designed to avoid sensitive ecological</p>	<p>NH has entirely avoided the issue of indirect impacts outside the scheme boundary, which was the point we were making on page 93 of REP2-069. The PDNPA has drawn further attention to the impact on the assemblage of breeding birds on the moors and the issue of roadkill of mountain hares REP4-012. REP4-026 para 6 has drawn attention to lapwing breeding grounds in the fields adjacent to the B6105 near its junction with Padfield Main Road. The impacts of the scheme’s traffic increases on these species has not been given due attention and we support the PNDPA’s and the Peter Simon’s concerns.</p>	<p>Please refer to National Highways response to the Examining Authority’s second written question 12.5 (REP6-017).</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	<p>features (such as the River Etherow). The recommendations from the Bat Conservation Trust and the Institution of Lighting Professionals, titled ‘ Guidance Note 8 Bats and Artificial Lighting ‘ have been followed when designing the lighting proposals. Vegetation screenplanting (including woodland and hedgerow) has been used to provide dark corridors and improved habitat links and quality. Taking these measures into consideration, alongside the net gain in habitats (such as woodland and hedgerow) as a result of the Scheme, it is considered that appropriate measures can be delivered.</p>	<p>The Peak District contains the only mountain hares in Britain outside Scotland and the Isle of Man. Whilst not on the endangered list, their numbers are in the low thousands, and they are a distinctive animal with which the Peak District is identified. Traffic on the A57 Snake Pass probably claims 20% of the adult hares living in the squares adjacent to the road (Derek Yalden, Mountain Hares, Derbyshire Mammal Group News, Spring 2004, Issue 3 page 3). Traffic increases on both the Snake Pass and A628 would further increase the risk of their roadkill.</p>	
9.69.43	<p>Impacts on Landscape</p> <p>As per Para 7.3.3 ‘ A detailed landscape and visual assessment has been undertaken following the requirements of DMRB LA 107 standard. The assessment is also informed by guidance set out in GLVIA3 and GLVIA3 Statements of Clarification.’ The conclusion of the assessment is that for landscape effects it is not considered that there would be any significant indirect effects on the landscape character within the Peak District National Park as a result of the Scheme.</p> <p>7.3.3 The study area is confirmed within the ES chapter 7: methodology, this confirms that landscape assessment study area extends to 1km, this was considered adequate given the nature of the scheme and that ‘ the presence of existing highway infrastructure generally precludes any likelihood of significant landscape and visual effects occurring over distances of greater than 1km’ .</p> <p>7.3.4 To inform the study area for the visual assessment a ZTV covering 10km was produced, this established the theoretical area from which any part of the scheme may be seen. The study area used for the visual assessment is 2 km offset from Scheme limits, this was confirmed by further desktop assessment and field surveys, the study area is considered appropriate as a result of the undulating topography and potential for sensitive receptors to view the Scheme from adjacent higher ground, for instance from within the PDNP.</p>	<p>We set out in REP4-015 that landscape impacts within the PDNP should be considered significant.</p>	<p>National Highways has no further comment to make.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
	7.3.5 The assessment of indirect visual effects within the Peak District National Park is as per methodology agreed with the stakeholders, as detailed within chapter 7 section 7.3, it focuses on Landscape Character Types within the Peak District National Park and the routes likely to experience potential changes to vehicular flows as a result of the Trans-Pennine Upgrade Scheme during its operation..		
9.69.44	<p>More carbon emissions</p> <p>7.4.1 Please refer to the Applicant’s response to section 4.4 of the Written Representation.</p>	NH’s response references section 4.4 which is addressing REP2-069 section 4.6 about very special circumstances and the Green Belt.	This cross reference was referring to National Highways’ response to section 4.4 ‘Effects on Greenhouse gas emissions’ of CPRE’s Deadline 2 submission – Written Representation (REP2-069). This response is in section 3 of Comments on CPRE PD&SY’s Written Representation (REP4-009).
9.69.45	7.4.2 Please refer to the Applicant’s response to the “Omission of AQMAs” in section 5.2 above.	See our rebuttal of NH’s Section 5.2 comments above.	
	CUMULATIVE EFFECTS		
9.69.46	<p>8.2.1 National Highways follows the methodology and advice set out in the Design Manual for Roads and Bridges (DMRB) for the design and evaluation of the impact of any of its road schemes. This ensures consistency in how any scheme is progressed and how the outcomes are evaluated.</p> <p>8.2.2 As per ES Chapter 7: Landscape and Visual Effects (REP2-007) Paragraph 7.3.3 ‘A detailed landscape and visual assessment has been undertaken following the requirements of DMRB LA 107 standard. The assessment is also informed by guidance set out in GLVIA3 and GLVIA3 Statements of Clarification.’</p> <p>8.2.3 The overall conclusions of ES Chapter 7 were carried through into ES Chapter 15: Cumulative Effects where the cumulative landscape effects were considered for single and different projects. This assessment was carried out in line with DMRB LA 104 and PINS Advice Note 17. Further details of the Cumulative Assessment methodology, along with the conclusions of the cumulative Landscape and Visual effects assessment, are presented in ES Chapter 15: Cumulative Effects.</p>	<p>We have responded to NH’s approach towards cumulative impacts in our submission for Deadline 4 REP4-016. In the context of the EIA Regs, the Environmental Statement presented for the DCO has not fulfilled the requirements with respect to cumulative effects and is therefore unlawful.</p> <p>Existing and/or approved projects - planning and infrastructure schemes - are identified in ES Chapter 15 Cumulative Effects. Transport Assessment Report 4.1.5 (APP-185) identifies that such projects are included in all three growth scenarios and ES Ch. 1-4 4.2.18 (REP2-005) identifies that such projects are included in the traffic model for both assessment of the future ‘do minimum’ and the future ‘do something’. By including these projects in the modelling both with and without the scheme, it is not possible to assess the cumulative effects of the scheme with these projects - we only know the effects the scheme would have as a standalone development in 2025 and 2040, or in “solus”.</p>	<p>Paragraph 4.16 of the NPSNN states: “When considering significant cumulative effects, any environmental statement should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence).”</p> <p>The traffic model is developed in line with DfT guidance, which requires other developments to be included inherently into the ‘do minimum’ scenario because they are with, or likely to gain’ planning permission. It would be unrealistic to include a scenario without future developments included in the traffic model.</p> <p>National Highways has undertaken the cumulative effects assessment in accordance with paragraphs 3.19 to 3.22 of DMRB LA 104.</p>

Response reference:	National Highways Response in REP4-009	CPRE Response at REP5-028	National Highways Response at Deadline 7
9.69.47	<p>Carbon Emissions</p> <p>8.3.1 The Applicant considers that the recent response to the SoS' s consultation letter (dated 26 January 2022 and 2 February 2022), which is referred to in the response to section 4.4 Effects on Greenhouse Gas Emissions of the Written Representation, is relevant here. It should be noted that in response to requests in Item 6(d) of Issue Specific Hearing 2 (ISH2) to respond in writing with respect to the SoS' s consultation, the Applicant will submit this in a Scheme specific response on or before Deadline 6.</p>	<p>The applicant has been asked to submit further information in writing by Deadline 6. We will respond once it is published.</p>	<p>No response required</p>

4. REP5-029 CPRE Peak District and South Yorkshire Branch Response to D4 submissions and comments on ISH2

Response reference:	Representation Issue	National Highways Response
9.69.48	<p>Item 2 Noise on footpaths</p> <p>1) The assessment in the table and the map of noise contours confirms our statement that the tranquillity in the vicinity of the scheme would be substantially harmed and local amenity impaired for those using the footpaths.</p>	<p>The map of noise and footpath locations (REP4-002) indicates that receptors on some footpaths/sections of footpaths will experience change in noise ranging from 'major increase' to 'major decrease'. It is not uniform.</p> <p>The Guidelines for Landscape and Visual Impact Assessment third edition [GLVIA3] page 158 defines tranquillity as 'A state of calm and quietude associated with peace, considered to be a significant asset of landscape'. Where tranquillity is considered to be relevant to landscape receptors in the Scheme study area it has been referred to in the assessment tables 7.26 'Effects on Landscape and Townscape Character Areas (Construction)' and 7.27 'Effect of Landscape and Townscape Character Areas (Operation)' of ES Chapter 7 Landscape and Visual Effects (REP6-006),.</p> <p>Where tranquillity is considered to be experienced and liable to change (increase or decrease) this has been considered in the assessment. However, changes tend not to be in the immediate vicinity of the existing Scheme and the more built-up areas and so the Applicant does not agree with the statement that the tranquillity in the vicinity of the scheme would be substantially harmed.</p>
9.69.49	<p>Item 3 Traffic Modelling</p> <p>2) In Item 3a), 'National Highways understands that the local highway authorities are broadly in agreement with the traffic modelling, but they have some outstanding queries on specific outputs which are under discussion. There is less agreement on the traffic modelling with some other interested parties, especially CPRE'. As NH revealed in the ISH2 Transcript (page 14, 56.30) there was no independent assessment of the traffic modelling – all the assurance was done internally between the consultants and NH as the client. DCC may be broadly satisfied but admits there are imperfections (REP4-010) and that more detail would have been preferable for Glossopdale (ISH2). It would be helpful if DCC would list the imperfections so we can all understand what the issues are.</p> <p>3) We have submitted a rebuttal of NH's response to our written representation REP2- 069, and Appendices A and B (REP2-070 and REP2-071) for Deadline 5. This demonstrates our fundamental disagreements with the modelling undertaken for the scheme. We quote two examples of previous modelling work by NH to demonstrate why we have a lack of confidence in the current modelling work. These are taken from the Statement of Case and Proofs of Evidence presented by the Highways Agency to the Mottram-Hollingworth-Tintwistle bypass public inquiry in 2007.</p> <p>(i) In 2007 the Highways Agency (now NH) forecast that by 2015 with or without the Mottram-Hollingworth-Tintwistle Bypass there would</p>	<p>2) No response required as question directed at DCC.</p> <p>3) (i) The previous air quality assessment was undertaken on a different scheme and cannot therefore be compared to the air quality assessment for the currently proposed Scheme.</p> <p>3 (ii) The traffic modelling used for the assessment of the Scheme is based on the most up to date traffic demand forecast produced by the Department of Transport (DfT).</p> <p>4) to 6) No further response from National Highways.</p>

Response reference:	Representation Issue	National Highways Response
	<p>be no exceedances of NO2. Yet here we are in 2022 with severe exceedances persisting, because the forecast was wrong. The assumption that vehicle technology would solve air pollution has proved to be hollow. The same may apply to today's assumptions – EVs may not solve air pollution or may be so delayed in their uptake that air pollution impacts continue.</p> <p>(ii) Similarly Highways Agency's traffic forecasts for the Mottram-Hollingworth- Tintwistle bypass also proved to be wrong. In 2001 on Mottram Moor there were 4,070 HGVs or 11% of 37,000 AADT. Although overall volumes of traffic were forecast to change slightly, the proportion of HGVs on the route was forecast to increase at a higher rate. In the DM scenario modelled for 2015 on Mottram Moor HGVs were forecast to number 4,500. The proportion was forecast to increase between 2015 and 2030 from 11% to 13%, or from 4,500 to 5,000 vehicles over the same period. However these forecast have not been realised. On Mottram Moor in 2015 according to NH's own counts (Case for the Scheme Figure 4.1) HGVs were 2,628 (9% of 29,200 AADT) or half what they were in 2007.</p> <p>4) Item 3e-g) Autonomous vehicles - This is an area of relevance but high uncertainty in terms of impacts. Modelling on multi lane dual carriageways indicates increases in efficiency, rising as the level of autonomy rises (for example that undertaken by Atkins using micro-simulation). The use of assisted driving is already happening on such roads, for example lane assist and speed limit warnings, the latter using the same information as satnavs.</p> <p>5) These benefits are less clear on single carriageways or any road with a level of urban frontage.</p> <p>6) The current scheme is very limited in length and has at grade junctions so is unlikely to benefit from any intermediate level of autonomy (i.e. other than full). Thus the A628 and A57 across the National Park would not benefit from the same lane efficiencies due to their being mostly single carriageway. However, they may benefit from improved speed limit enforcement through the increasing level of autonomy/driver assistance functionality in new cars and goods vehicles.</p> <p>7) The use of the motorway and near motorway network for new infrastructure such as autonomy is under development and this includes freight with possible overhead power supply (NH has a pilot), and other means of improving safety through semi- autonomous features in new and future vehicles, both for goods and personal travel.</p>	

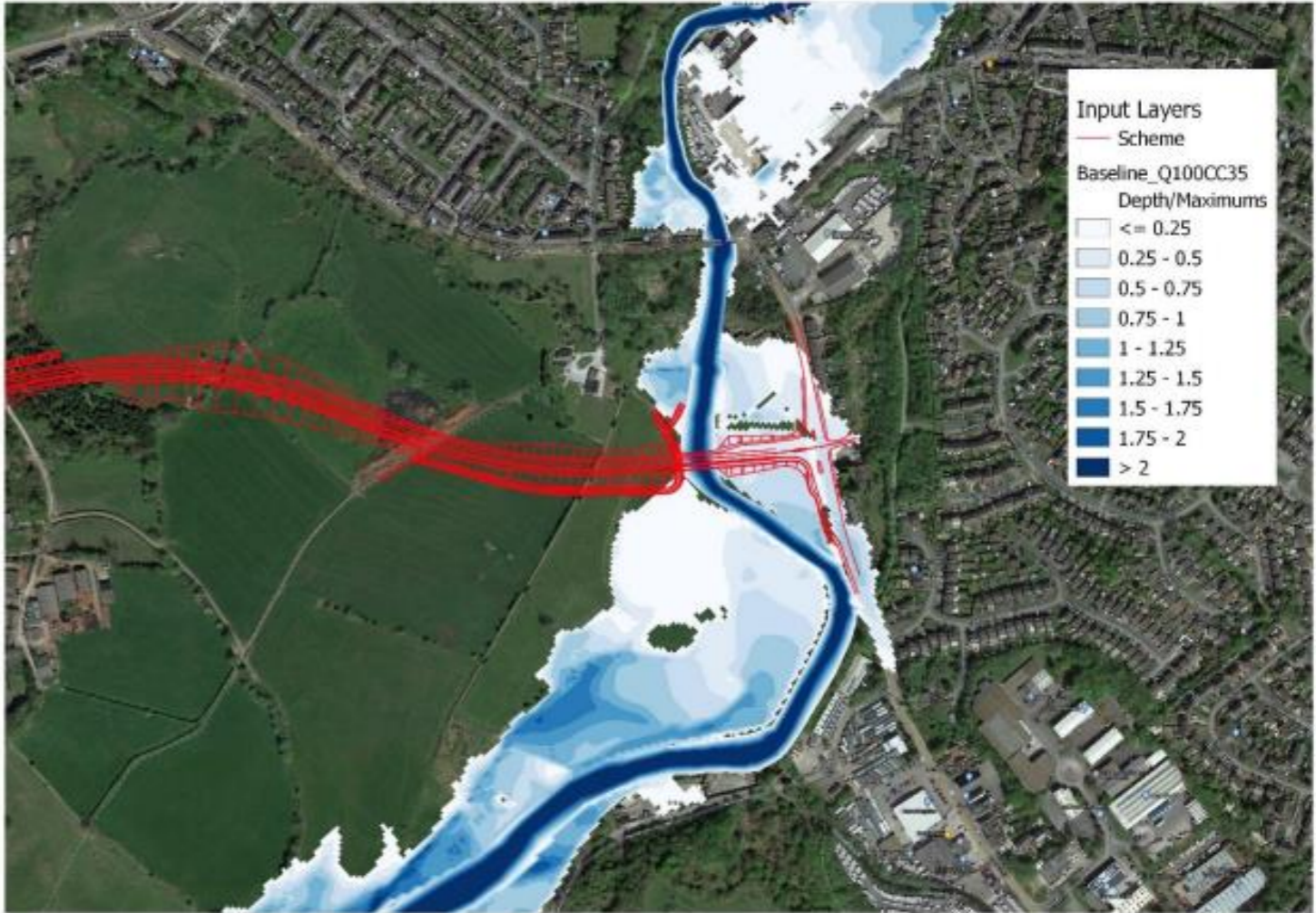
Response reference:	Representation Issue	National Highways Response
	8) Overall, the conclusion is that motorways will benefit from partial autonomy and associated infrastructure while single carriageways will not.	
9.69.50	<p>Item 3 Traffic Effects Outside of the Order</p> <p>9) A number of IPs, including CPRE, are extremely concerned at the impacts of the scheme on travel and traffic within Glossopdale (REP4-014, REP4-018, REP4-023, REP4-024, REP4-026, REP4-027, REP4-029, REP4-030). The scheme would lead to redistribution of traffic from the A57 onto residential roads with school access, parked cars, narrow pavements and people on foot and cycle going about their daily business.</p> <p>10) It is unsatisfactory and unacceptable for NH to dismiss these impacts as insignificant. DCC acknowledge there has been a lack of attention to the local road network in Glossopdale (REP4-010, page 12). DCC also admitted that previous iterations of the scheme had shown the same impacts on Glossopdale (and the Snake Pass). We can confirm that this is correct, as the full Mottram-Hollingworth-Tintwistle bypass would have produced similar impacts. Why then did DCC not insist on more detailed examination of the impacts?</p> <p>11) A rigorous examination of these impacts is now required. NPSNN (5.212) requires 'schemes should be developed and options considered in the light of relevant local policies and local plans, taking into account local models where appropriate' (5.212; our emphasis). Whether or not DCC has a local model is immaterial – NH must show that the scheme has been developed and options considered in the light of local policies and plans. MTRU has shown (REP4-015) that NH has ignored both GMCA's Right Choice policy for 50% of trips to be made by active travel and public transport by 2040 and DfT's Decarbonisation Plan policy for 50% of trips to be made by active travel by 2030.</p> <p>12) The IEMA standards were quoted to show mitigation is not required – only an increase in flows of 60% or more are considered significant. These are inappropriate standards for, and not compliant with, low-traffic neighbourhoods as sought by NPPF 2021 and the National Design Standard. NPPF 2021 para 92 seeks strong neighbourhoods that promote social interaction, are safe and accessible, and that enable and support healthy lifestyles. The National Design Guide also recognizes that public spaces, particularly streets, are important for all users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. They should encourage people to walk and cycle rather than to depend upon cars, particularly for short, local journeys. Increased traffic with rat running by drivers</p>	<p>9) The Scheme reduces the amount of traffic redistributed on to unsuitable roads compared to the Do-minimum scenario. The impacts of the additional traffic on roads in Glossop due to the Scheme have been assessment by National Highways and no significant adverse consequential effects identified.</p> <p>10) No response required as question directed at DCC.</p> <p>11) As set out in the Case for the Scheme (REP2-016), relevant local plans and polices have been taken account of in the development of the A57 Link Roads Scheme. The remainder of paragraph 5.212 of the NN NPS confirms that "the scheme must be decided in accordance with the NPS except to the extent that one or more of sub-sections 104(4) to 104(8) of the Planning Act 2008 applies".</p> <p>12) See response to 9) above.</p> <p>13) Any proposed future improvements to the junction of the A57 with Shaw Lane, other than signal timing optimisation, do not form part of the Scheme. Should Derbyshire County Council (DCC) decide to pursue improvements to this junction in the future, then its impacts would need to be fully assess by DCC and the scheme consulted on prior to implementation.</p>

Response reference:	Representation Issue	National Highways Response
	<p>seeking quicker routes will increase the sense of road danger, disincentivise active travel, and increase car dependency, thereby leading to unhealthy lifestyles, less coherent communities and more road crashes.</p> <p>13) DCC is now requesting changes to the junction between the A57 and Shaw Lane, because with the scheme it would be operating beyond capacity. We are not given any details but such changes would usually require a planning application which would then be widely advertised for public consultation. Any material changes, such as this proposal for the A57/Shaw Lane junction, agreed though the DCO process would not be subject to such consultation. It should not be part of the DCO and the impact on the junction should weigh against the scheme in the planning balance.</p>	
9.69.51	<p>Item 3 Effects within the PDNP</p> <p>14) NH continues to dismiss the effect of the Scheme on road safety on the A57 Snake Pass and on the A628T as insignificant. On both roads crashes increase over 60 years</p> <p>- 41 PIA on the A628 and 163 PIA on the Snake Pass are forecast. We are expected to take the results of the traffic modelling seriously when it comes to air quality or carbon emissions but to dismiss them when it comes to road crashes. Any increase in road crashes is contrary to the requirements of all of the following and unacceptable:</p> <ul style="list-style-type: none"> • the NPSNN 2014; • the Strategic Framework for Road Safety 2011, paras 1.21 and 1.27; • the DfT's The Road Safety Statement 2019 A Lifetime of Road Safety; • National Park policy T1 and T2; • Transport for the North's Strategic Transport Plan 2019 pages 38 & 61; • the NH licence agreement • DCC LTP 3 2011-2026; • South Yorkshire Mayoral Combined Authority 'Safety for all road users must remain of paramount importance'; 	<p>14) Please refer to National Highways' comment 9.54.65 on Keith Buchan obo CPRE PDSY Deadline 4 submissions (REP5-022).</p> <p>15) Please refer to National Highways' response 3.25 to the Examining Authority's First Written Questions (REP2-021).</p>

Response reference:	Representation Issue	National Highways Response
	<ul style="list-style-type: none"> • South Yorkshire Local Transport Plan; • Sheffield City Council Transport Strategy (2018); • Kirklees MBC 2025 Transport Vision; • GMCA's 'ambition' ...'To reduce deaths on our roads as close as possible to zero (by 2040)' <p>15) In order to address the increased risk of crashes on the Snake Pass DCC is proposing average speed cameras. Both NH and DCC should be mindful of their section 62 duty under the Environment Act to have regard to National Park purposes. The impacts of such a safety scheme are not mitigatable and do not address the fundamental issue that traffic should not increase if the Park's statutory purposes are to be fulfilled. Such measures should only be applied in extreme circumstances, according to PDNPA policy.</p>	
9.69.52	<p>Item 3 Impacts on public transport</p> <p>16) The data we requested for public transport arrived at the end of the day on Friday 18th February and has not got the full matrix information. Analysis will take a little time, especially since there appear at first sight to be some sector to sector mode share numbers which need sense checking. There seems to be a very high level of variation.</p> <p>17) Overall there are a small number of public transport trips, we understand this is at least due to the fact that only public transport trips by people who have a car available are in the model. This is important to clarify since the ISH discussed public transport and how far it was included in the model. It is clear that walking and cycling are not included. It is also clear that a significant amount of public transport use is not included and this needs to be the subject of discussion with NH to make sure this is correct and whether it is possible to estimate the level of missing trips and what their origins and destinations are.</p>	<p>16) The public transport information requested by CPRE needed to be compiled and checked and was issued to CPRE by National Highways as quickly as possible. National Highways will respond to CPRE regarding any queries they have on the information provided.</p> <p>17) Please refer to National Highways' response 3.3 to the Examining Authority's Second Written Questions (REP6 -017)</p>
9.69.53	<p>Item 4 Landscape, visual and Green Belt</p> <p>18) We support the PDNP in its request for views of the scheme from the B6105 north of the junction with Padfield Main Road.</p> <p>19) We also support the PDNPA's response to ISH2 in REP4-012. By rejecting traffic restraint within the PDNP, NH is imposing adverse impacts on the PDNP. We consider the changes in traffic within the National Park would lead to significant adverse effects on landscape, visual amenity, tranquillity and dark skies, as we presented in our written representation REP2-069 and our response to ISH2 REP4- 016.</p>	<p>18) Please see National Highways' written response to ISH2 Item 4 f) (REP4-008)</p> <p>19) Please see National Highways' written response to ISH2 Item 4 t) (REP4-008)</p>

Response reference:	Representation Issue	National Highways Response
9.69.54	<p>Item 6 GHG</p> <p>20) The ExA asked NH for an assessment of cumulative effects of GHG, the results of which we await before responding on GHG emissions. 'In addition Scheme specific data will be included in the response which will provide the change in GHG Emissions (With Scheme Scenario – Without Scheme Scenario) using updated Government Guidance since the publication of the Environmental Statement. These are:</p> <ul style="list-style-type: none"> (i) Emission Factor Toolkit (version 11) (EFT v11), published by Defra in November 2021... (ii) A sensitivity test of the Transport Decarbonisation Plan (TDP) upper and lower bounds'. <p>21) It appears from this response that new modelling runs are to be undertaken. These will include a faster rate of electrification (as we pointed out in previous submission) and some reflection of the DfT Decarbonisation Strategy, which we also support. However, the assumptions on which these runs are based will, essentially, determine the results. We would call for a fully modelled Decarbonisation Strategy option with the schemes which will achieve it for walking, cycling and public transport included but not the A57 scheme. The impact of the scheme could then be tested.</p> <p>22) Simply using a traffic reduction figure for the Decarbonisation Strategy (itself derived from the CCC work we have set out in a previous submission) and assuming it will come about by a general application of policy is very much second best. It also ignores the conflict with policy to which we have given economic values in our D4 submission.</p> <p>23) Whatever is done it must allow for:</p> <ul style="list-style-type: none"> • identification of the revised electrification pathway and assumptions used for a run separately from other Decarbonisation Strategy factors • a run which is a plausible Do Minimum: i.e. contains a package of encouragement for sustainable travel and discouragement for traffic in all the relevant areas (towns and cities) • a run which is a plausible Do Something: i.e. the current scheme as previously modelled but with the electrification pathway changed. 	<p>20) to 23) Please refer to National Highways' Deadline 5 submission '9.59 Applicant's response to Issue Specific Hearing 2 Item 6 c) and d) Cumulative Carbon Assessment' (REP5-026).</p>
9.69.55	<p>24) There is also an issue here of public confidence. The figures produced are likely to change significantly. The outputs from the modelling will</p>	<p>24) The approach and assumptions in the modelling have not changed from those reported in Chapter 14 of the ES. The data reported in Table 1 of the Item 6 d) response (REP5-026) presents the change in</p>

Response reference:	Representation Issue	National Highways Response
	depend on the assumptions used and the approach, for example how the change in trips from the Decarbonisation Strategy are applied to the model. There are ways in which the approach taken will determine the outcome and to an extent this is predictable.	'Do-minimum' and 'Do-something' carbon dioxide equivalent (CO _{2e}) emissions using the Emission Factor Toolkit (EFT) (version 11) (EFT v11) and National Highways Carbon Emissions Calculation Tool v2.4 (2021), compared with those previously reported in ES Chapter 14 Climate (REP1-019).
9.69.56	25) In addition, it seems likely that the results from this new modelling will be very different from that presented to the Examination so far. In these circumstances the equivalent data would be requested from NH for the new runs and CPRE would wish to have a reasonable time to consider them properly. We doubt this can be achieved within the current timescale, even if NH were more prompt than they have been so far. For this reason we think that the process may have to be started again but hopefully with more openness to technical discussion and dialogue.	25) As stated in the response to para 24) above, the modelled results that have been presented has used the same data inputs that were used for the assessment reported in ES Chapter 14 Climate (REP1-019), it is only the emission factors that have been updated.
9.69.57	<p>Item 6 GHG mitigation measures</p> <p>26) Active travel measures are proposed as part of the mitigation of GHG emissions. According to DfT's Decarbonisation Plan active travel measures would have minimal impact on reducing carbon emissions. They could contribute a small saving of between 1-6MtCO₂, but with increased uptake of ULEVs and ZEVs this would reduce to 1-2MtCO₂. This is out of total savings from other modes of 1,307-1,797MtCO₂. As DfT's Decarbonisation Plan recognises, active travel is important for other reasons e.g. health and community vibrancy, but measures to encourage it should not be used in the planning balance to mitigate carbon emissions.</p>	<p>26) Reductions in GHG emissions due to these measures have not been quantified or considered in the assessment, however the Applicant acknowledges that active travel measures would not result in a significant reduction in GHG emission associated with the Scheme.</p> <p>The proposals are primarily embedded into the design to encourage people to walk and cycle through provision of routes that are more attractive and safer to use. They connect with national trails without the need to use roads, and are also future friendly as they would tie in with TMBC's proposed cycle scheme from Hyde to Hollingworth in the future.</p>
	<p>Item 7 Air Quality</p> <p>27) AQMAs – we continue to maintain that both Tintwistle and Dinting Vale AQMAs should be subject to a full assessment. HPBC will be making further comments after which we will respond as appropriate.</p>	27) No response required
9.69.58	<p>Item 8 Other specific Issues</p> <p><i>The water environment, drainage, flood risk assessment, Water Frameworks Directive</i></p> <p>28) Item 8c) We note the Environment Agency's concerns about the flood risk assessment undertaken by NH. Over the weekend of 19/20 February 2022 the A57 between Woolley Bridge and Melandra road, where the Link Roads would join the existing road network, was subject to flooding (see photo below) and residents were evacuated from the</p>	The Flood Risk Assessment (FRA) (REP5-010) identifies this area as an existing flood risk area. The EA also knows this is an area at risk of flooding. The flood risk mitigation work presented in the FRA as part of the Etherow crossing seeks to improve this situation, not just through the compensatory flood storage provision but with new and improved flood defence along the left bank, immediately upstream of the Etherow crossing. Please see pre and post Scheme flood risk in this area (Inserts 4-4 and 4-7 from the FRA). Consultations on the FRA with the EA will be ongoing throughout the Detailed Design stage.

Response reference:	Representation Issue	National Highways Response
	<p>area. The A57 is regularly subject to flooding in this area, and lies in flood risk zone 3a (Manchester SFRA Detailed Tameside Map 21). This location is inappropriate for new road infrastructure, as reinforced by recent events.</p> <p>29) The photo below is looking east along the A57, The pedestrian crossing lights for the Pennine Bridleway can be seen at the extreme left of the picture.</p> <p>[refer to original document for photographs]</p>	 <p>Insert 4-4 Baseline Flood depth map in relation to the proposed Scheme footprint for the 1% AEP event plus 35% climate change allowance</p>

Response reference:	Representation Issue	National Highways Response
		<p>Insert 4-7 Post Scheme Flood depth map for the 1% AEP event plus 35% climate change allowance</p>
9.69.59	<p>Land use, social and economic and health</p> <p>30) Item 8 g) Concerns have been raised regarding the effect of increased traffic volumes on the Snake Pass affecting land stability on the route, and the disruption this may cause. Over the weekend of 19/20 February 2022 there was a substantial landslip on the Snake Pass just east of Alport Bridge (see photo below looking west along the A57 below Gillott Hey as it dips towards Alport Bridge). This caused the land adjacent to</p>	<p>Please refer to Derbyshire County Council’s response to question 14.1 in The Examining Authority’s second written questions and requests for information (REP6-026). This suggests that DCC have assessed the structural failures to be due to associated geology, climatic issues, and prolonged heavy rain rather than due to traffic.</p>

Response reference:	Representation Issue	National Highways Response
	<p>the road to drop more than four feet, as demonstrated by the fallen fence, which exposed the unstable shale foundations to the road. The road was undermined and the westbound carriageway is cracking along its length in response to this. It is now closed to through traffic for an undetermined period.</p>	
9.69.60	<p>31) The A57 Snake Pass crosses several areas of unstable land and regularly slips, causing disruption to traffic using the road. On this occasion heavy rainfall from Storm Franklin was responsible for the acute event. However, the landslips continue to develop and occur without the stimulus of storms. Increasing traffic would increase the frequency of vibration of the ground which will lead to an increased likelihood of landslips. There is much evidence from around the world that vibration induced by traffic contributes to land instability. This is a strong argument weighing negatively in the planning balance.</p>	<p>See response to 30) above.</p>

5. REP5-038 CPRE Peak District and South Yorkshire Branch Correspondence regarding CPRE's Deadline 5 submission

Response reference:	Representation Issue	National Highways Response
9.69.61	<p>We are just alerting you to a delay in submitting our completed work on alternatives and carbon. At the ISH2 we promised to do this by D4 Feb 23rd. We did note however that was contingent on getting the requested information from National Highways. At 1800hrs on 18th Feb National Highways emailed us with some, but not all, of the public transport information we requested. A simplified version was agreed at NH's request so this is now a part of what was already less than requested. We consider impact on public transport and other sustainable modes, and how this has been modelled, as critical to assessment of this scheme. It will be even more important if the scheme is subject to new modelling using a forecast based on the DfT Decarbonisation Strategy, which now seems to be being proposed by NH (page 37, Item 6 of the Response to the ISH2). Despite pressing National Highways repeatedly on this public transport issue we have still not received the data we requested. This has inhibited our ability to make complete submissions within the timescales available, which otherwise we would. Consequently this further delay has meant we have been unable to meet the 23rd Feb deadline. We do hope you would accept a late submission, once we have the outstanding data and have analysed it.</p>	<p>As of 7 March 2022 the Applicant has provided all of the information requested from CPRE, with the exception of the External to External modelled Public Transport movements. This is because external to external modelled public transport demand is fixed, we can confirm the variable demand model does not modify these trip patterns and these values do not form any part of the appraisal for the A57 Scheme, this reasoning has also been conveyed to CPRE.</p>

6. REP5-030 Tameside Metropolitan Borough Council comments on ISH1

Reference	Agenda Item	Tameside MBC response at REP5-030	National Highways Response
9.69.62	<p>PARTS 1 TO 7</p> <p>Article 2(1) Interpretation - commence</p> <p>Pre-commencement activities are those that are excluded from the definition of “commence”. The Applicant [REP2-021 Q1.7] said that precommencement operations are minor and are either de minimis or have minimal potential for adverse effects.</p> <p>a) Please could the local authorities comment?</p>	<p>a) It is considered that pre-commencement surveys / works are likely to be minor and should have minimal potential for adverse effects.</p>	No response needed.
9.69.63	<p>Articles 14(6), 18(11), 19(8), 21(6) – Deemed consent</p> <p>The ExA is concerned that there is the potential for a lack of awareness about a guillotine being in place when the consents would be applied for. It is beneficial for consents to be properly considered and, therefore, for them not to be given by default unless reasonable measures have been taken.</p> <p>The ExA is concerned that the 28-day period appears to be less than some parties are comfortable with and is minded that highlighting the guillotine in any application for consent would be helpful for ensuring that the timescale for dealing with consents is reasonable. The Applicant does not appear to have provided a compelling reason why providing a statement to highlight the guillotine would cause it difficulty.</p> <p>o) Please could the Applicant and the local authorities comment? Is this a matter that the parties should take away to discuss and attempt to seek agreement? Please could an update be provided for Deadline 5, on Wednesday 23 February 2022?</p>	<p>o) Tameside Metropolitan Borough Council agree with the ExA’s comments and it should be a matter to be discussed between the parties to attempt to seek an agreement.</p> <p>We will continue to discuss with the applicant to seek agreement on a timescale for any guillotine clause. These matters remain under discussion with the applicant.</p>	Appropriate drafting was added to the dDCO at Deadline 6 (REP6-002).
9.69.64	<p>SCHEDULES 1 AND 2</p> <p>Requirements 3-11 - Provisions for consultation and agreement</p>	<p>u) Tameside Metropolitan Borough Council have no outstanding concerns about the provisions for consultation or agreement.</p>	No response needed.

Reference	Agenda Item	Tameside MBC response at REP5-030	National Highways Response
	<p>Tameside Metropolitan Borough Council [REP2-056 Q1.32] made a number of suggestions about where it might be helpful to add provisions for consultation or agreement to be required with relevant bodies. The Applicant [REP3-021 page 45] responded at Deadline 3.</p> <p>u) Does Tameside Metropolitan Borough Council have any outstanding concerns about the provisions for consultation or agreement?</p>		
9.69.65	<p>Requirement 4 – Requirement 4(1) and (2) second iteration EMP</p> <p>The Applicant [REP2-021 Q1.33] said that it had no objection to there being a requirement for consultation on the second iteration EMP with the local highway authorities and the Environment Agency, as well as with the relevant planning authority, should the local authorities and Environment Agency require this.</p> <p>v) Please could the local authorities and the Environment Agency comment?</p>	<p>v) Tameside Metropolitan Borough Council would expect to be consulted on any changes to the EMP as part of the second iteration.</p>	<p>Consultation of TMBC is agreed and Requirement 4(1) in the dDCO (REP6-002) includes this consultation.</p>
9.69.66	<p>Requirement 4(2)(c) - second iteration EMP - Working hours</p> <p>The ExA [PD-009 Q1.34] suggested that the following be added after Requirement 4(2)(c):</p> <p>“Provided that written notification of the extent, timing and duration of each activity is given to relevant local authorities in advance of any works that are to be undertaken outside of the specified hours, except for any emergency works, which are to be notified to the relevant local authorities as soon as is practicable.”</p> <p>“Any other work carried out outside the specified working hours or any extension to the working hours will only be permitted if there has been prior written agreement of the relevant environmental health officer and provided that the activity does not give rise to any materially new or materially worse</p>	<p>z) Tameside Metropolitan Borough Council would support the inclusion of the suggested phrases.</p>	<p>The first paragraph of the suggested additional wording was included in the dDCO (REP5-006) and a variant of the second paragraph suggested by the ExA has been incorporated in the dDCO submitted at Deadline 6 (REP6-002).</p>

Reference	Agenda Item	Tameside MBC response at REP5-030	National Highways Response
	<p>environmental effects in comparison with those reported in the environmental statement.”</p> <p>z) Please could the local authorities comment?</p>		
9.69.67	<p>Requirement 4(4) and 4(5) – third iteration EMP.</p> <p>The ExA [PD-009 Q1.35] suggested that provisions be added for the third iteration EMP to be required to:</p> <p>be submitted to and approved in writing by the Secretary of State</p> <p>be consulted on with relevant planning authorities, the local highway authorities and the Environment Agency</p> <p>be substantially in accordance with the measures for the management and operation stage in the first iteration EMP</p> <p>incorporate the measures for the management and operation stage referred to in the ES as being incorporated in the EMP</p> <p>The Applicant [REP2-021 Q1.35] responded that those are covered by the DMRB. The ExA considers that the provisions are key to the proper implementation of the EMP and therefore seeks certainty that they will be followed. Their inclusion in Requirement 4 appears to be supported by Tameside Metropolitan Borough Council [REP2-056 Q1.35], Derbyshire County Council [REP2-051 Q1.35], and the Environment Agency [REP2-052] Q1.35], except that they didn't comment in relation to the Secretary of State.</p> <p>bb) Please could the local authorities comment?</p>	<p>bb) Tameside Metropolitan Borough Council should be consulted on any third iteration.</p>	<p>The third iteration EMP must be developed and completed by the end of the construction, commissioning and handover stage of the authorised development, in accordance with the process set out in the approved second iteration EMP, which TMBC are consulted upon and, therefore, TMBC's continued consultation on the third iteration EMP can be secured.</p> <p>Please see also National Highways response to the Examining Authority's Second Written Question 1.12 (REP6-017).</p>
9.69.68	<p>Requirement 5 – Landscaping</p> <p>cc) Please could the local authorities comment on whether it is sufficient to require the landscaping to be in accordance with an approved scheme? Or should the landscaping scheme be approved at a specified time, for example before pre-commencement works or before</p>	<p>cc) Tameside Metropolitan Borough Council consider it is reasonable for approval of the landscaping to be conditioned to be approved before any construction works commence.</p>	<p>Appropriate drafting was added to the dDCO at Deadline 6 (REP6-002).</p>

Reference	Agenda Item	Tameside MBC response at REP5-030	National Highways Response
9.69.69	<p>construction works commence?</p> <p>Requirement 10 – Archaeological remains</p> <p>The ExA [PD-009 Q1.35] suggested that requirements be added for any matters to be consulted and/ or agreed in writing with the Secretary of State or the County Archaeologist any programme of archaeological reporting, post excavation and publication to be consulted on and/ or agreed in writing suitable resources and provisions for long term storage of any archaeological archives to be consulted on and/ or agreed in writing</p> <p>Their inclusion is supported by Tameside Metropolitan Borough Council [REP2-056 Q1.43], Derbyshire County Council [REP2-051 Q1.43], and High Peak Borough Council [REP2-053 Q1.43].</p> <p>The Applicant has submitted a Written Scheme of Investigation [REP1-034].</p> <p>mm) Do the local authorities have any comments on the Written Scheme of Investigation? Should be included in Requirement 10 and Schedule 10?</p>	<p>mm) Tameside Metropolitan Borough Council have no outstanding concerns about the Written Scheme of Investigation. It should be included in Requirement 10 and Schedule 10.</p>	<p>No response needed.</p>
9.69.70	<p>Requirement 12(1) Details of consultation – minimum period</p> <p>The Applicant and local authorities have suggested consultation periods ranging from 14 days to 28 days.</p> <p>nn) Please could the Applicant, local authorities and the Environment Agency comment further? Can a consultation period be agreed?</p> <p>The ExA may ask more questions or invite more oral submissions.</p>	<p>nn) It is important that a common consultation period is agreed between the parties and we see no reason why a suitable consultation period cannot be agreed. These matters will be discussed further with the applicant.</p>	<p>The Applicant has suggested a period of 21 days and this will be discussed further with TMBC.</p>

Reference	Agenda Item	Tameside MBC response at REP5-030	National Highways Response
9.69.71	<p>SCHEDULES 3 TO 10 Schedule 3, 4 and 5 The Applicant has updated Schedule 3 and 4.</p> <p>a) Have Tameside Metropolitan Borough Council and Derbyshire County Council reviewed the latest versions [REP3-002]? Do they have any further comments?</p>	a) Schedule 3 and 4 remain under review.	No response needed.

7. REP5-031 Tameside Metropolitan Borough Council Comments on ISH2

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
9.69.72	<p>Construction phase Pre-commencement</p> <p>Pre-commencement activities are those that are excluded from the definition of “commence” in Article 2 of the dDCO.</p> <p>The Applicant [REP2-021 Q9.11] said that there were unlikely to be significant effects during pre-commencement. It also appears to suggest that mitigation measures including a noise and vibration plan, Best Practicable Means and a noise and vibration complaints process during precommencement would not be required.</p> <p>d) Please could the local authorities comment?</p>	<p>d) It was understood that the mitigation measures mentioned would include pre-commencement works. This was covered in the REAC [REP1-037] Table 2.1 Rows GEM 1.1 & 1.2 –</p> <p>“Principal contractor must prepare an EMP (2nd iteration) for the works prior to commencement of the works and which details the measures that should be undertaken prior to, and during construction of, the Scheme.</p> <p>If there were to be any significant effects from operations during precommencement then Tameside Metropolitan Borough Council would need to be consulted to discuss appropriate traffic management, traffic diversions, signage etc as appropriate.</p>	Noted
9.69.73	<p>Night works and Section 61 consent</p> <p>Paragraph 11.21 of ES Chapter 11 states that “no night works are anticipated with the exception of traffic management”? Please clarify what has been considered in the assessment. Requirement 4 of the dDCO lists potential activities outside normal working hours.</p> <p>The Applicant [REP2-021 Q9.7] said that Section 61 works would encompass all construction activities, including night time works in addition to those report in the ES.</p> <p>The ExA needs to be satisfied that the assessment considers a reasonable worst-case scenario. The REAC [REP1-037] mentions the potential for Section 61 consent.</p> <p>g) Please could the Applicant and local authorities comment on the potential for Section 61 works to result in significant effects?</p>	<p>g) If all measures detailed in ES Chapter 11, the EMP and the Noise & Vibration Management Plan, and any additional measures as appropriate, are undertaken then this should reduce the potential for any significant effects. This would need to be confirmed in writing to Tameside Metropolitan Borough Council.</p> <p>Where works comprise ‘out of normal working hours’, night-time and weekend working this will necessitate Section 61 consent.</p>	Please refer to National Highways response to Item 2 g) of the Written summary of Applicant's case at ISH2 (REP4-008).

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
9.69.74	<p>Mitigation</p> <p>The Applicant [REP2-021 Q9.12] referred to mitigation measures included in the REAC [REP1-037].</p> <p>l) Please could the local authorities comment on whether enough detail been provided of the mitigation measures at this stage, to ensure that the assessed mitigation would all be delivered? Should more detail be provided of the need for the extent of monitoring to be consulted on and agreed and on any follow-up actions that might be necessary?</p> <p>Should more detail be set out on the complaints process and interfaces with the local authority?</p>	<p>l) Sufficient detail of the proposed Scheme has been provided in REAC [REP1-037] Table 2.2 Sections 1 – General Environmental Management & Section 8 – Noise & Vibration.</p> <p>Details of the proposed complaints process should be provided together with how this will be managed. The scope and extent of monitoring to be implemented before works commence should be detailed.</p>	Please refer to National Highways response to Examining Authority Written Question 2 6.7 (REP6-017).
9.69.75	<p>Noise barriers</p> <p>The Applicant [REP2-021 Q9.19] has advised that absorbent noise barriers have some potential to reduce noise levels at Mottram Moor Junction and to the west of the underpass.</p> <p>p) Please could the Applicant and the local authorities comment on whether absorbent noise barriers should be secured at one or both of those locations? Should criteria be secured for when the use of absorbent noise barriers would be required?</p>	p) The Applicant's noise monitoring and modelling will determine, based on the relevant standards, whether absorbent noise barriers should be secured at one or both of those locations specified.	No response required
9.69.76	<p>TRANSPORT NETWORKS AND TRAFFIC, ALTERNATIVES, ACCESS, SEVERANCE, WALKERS, CYCLISTS, AND HORSE RIDERS</p> <p>Traffic modelling</p> <p>a) To what degree are the Applicant, local highway authorities and interested parties in agreement regarding the scope and detailing of the traffic model and what are the remaining areas of dispute?</p> <p>What level of detailed modelling is appropriate for Manchester and Sheffield?</p>	<p>a) Tameside does not have any remaining areas of dispute concerning the scope and detailing of the traffic model. We will continue to discuss these issues with National Highways if any changes/modifications are made to the traffic model to understand how these may affect the transport network within Tameside.</p> <p>b) The level of detailed modelling provided for both Manchester and Sheffield is appropriate.</p> <p>c) We do not consider that more detailed modelling would be appropriate for Manchester and Sheffield. We agree with National Highways response to the ExA written questions Q3.1 and Q3.2 as set out within</p>	No response required

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>Would more detailed modelling of Manchester and Sheffield be appropriate. If so, why and if not, why not?</p> <p>To what extent has the Applicant considered policies aimed at traffic restraint (including encouraging routes that avoid the National Park), reducing reliance on motor vehicles and encouraging active travel within the traffic model, and any effects of the introduction of the Greater Manchester Clear Air Zone? Are these reflected in the model?</p> <p>Has the Applicant considered the effects of autonomous vehicles on congestion within the traffic modelling?</p> <p>What further implications, if any, would a change to the use of autonomous vehicles have for air quality and noise?</p> <p>Would a change to autonomous vehicles have any effects on the Case for the Scheme?</p> <p>Do the above parties have any comment on those matters above?</p>	<p>[REP2-21] that the forecast effects the proposed scheme will have on journey times over the wider road network outside the limits of the DCO, including Manchester and Sheffield, have already been accounted for in the assessment of the benefits of the Scheme.</p>	
9.69.77	<p>Traffic effects outside of the Order Limit Effects within Glossop</p> <p>Traffic flows within Glossop are predicted to increase as a result of the Do-Something scheme when compared to those under the Do-Minimum.</p> <p>l) Do the local authorities have any comments?</p>	<p>l) Tameside Metropolitan Borough Council have no further comments on this matter.</p>	No response required
9.69.78	<p>Effects in Tintwistle, Hollingworth/Hadfield</p> <p>Derbyshire County Council [REP2-051 Q3.21, Q3.22 and Q14.4] raise concerns that traffic may divert off the A628 through the residential areas, or that traffic levels will increase on Woolley Lane if vehicles turn left at the Gunn Inn Junction, rather than carry on to the Mottram Moor Junction.</p>	<p>o) Tameside Metropolitan Borough Council have held initial discussions with the applicant in relation to the proposals on the A57 Woolley Lane, but proposals will be finalised and agreed as part of the detailed design process. Derbyshire County Council will be consulted on any proposals at this stage.</p>	No response required

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>o) Do the local authorities have any comments?</p>	<p>The aims of the proposed works on Woolley Lane are to:</p> <ul style="list-style-type: none"> To discourage through traffic so that such traffic is encouraged to use the new link road. To reduce traffic speeds. To improve road safety. To improve the environment for non-motorised users. To make the reduced speed limit self-enforcing. To reduce the dominance of vehicular traffic. To reduce severance for non-motorised users and thus improve connectivity. To encourage local trips to be made on foot or by bicycle, rather than by car. <p>There are currently traffic management/traffic calming measures in place in the residential area between the A628 Market Street/A57 Woolley Bridge in Hollingworth to reduce the amount of traffic cutting through this area.</p> <p>The provision of a left turn ban on Woolley Lane to ensure that traffic heading towards Manchester does not turn left from the A628 onto it before it gets new link road, may well encourage traffic to Glossop to use the roads linking through to Glossop in the Tintwistle area. In addition, the provision of a prohibition of the use of Woolley Lane from the A628 would be detrimental to:</p> <p>The future introduction of public transport services on Woolley Lane to/from Glossop to serve the residents near Woolley Lane.</p> <p>This would cause significant problems for the residents of the residential area adjacent to Woolley Lane. Earnshaw St, Lord St and Cross St are one way from Woolley Lane and residents would face the possibility of a long diversion via the A57 Link Road, Woolley Bridge and Woolley Lane to reach them.</p> <p>The provision of the proposed measures on Woolley Lane and the A57 Link Road will significantly reduce the use of Woolley Lane</p>	

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
9.69.79	<p>Effects within the National Park</p> <p>What consideration has the Applicant given to the effects of increases in traffic identified within the traffic modelling for the Do-Something scheme, when compared to those of the Do-Minimum scheme with reference to highway safety and severance?</p> <p>If necessary, how could these be addressed?</p> <p>Do the local authorities have any comments?</p>	<p>The proposals at the Woolley Lane junction will provide pedestrian crossing facilities at this junction in order to improve pedestrian access at this junction and connectivity where currently none exist at present.</p>	No response required
9.69.80	<p>Connectivity within the Order area</p> <p>Tameside Metropolitan Borough Council [REP2-056 Q3.15] mention the possible provision of a link for walkers, cyclists and horse riders between the link road and Roe Road.</p> <p>s) What benefits/disbenefits would, in the view of the Applicant and the Local Highway Authorities, result from such provision, and would there be a connectivity to the bridleway provision from Old Hall Lane?</p>	<p>s) Local Highway Authority –</p> <p><u>Benefits</u></p> <p>As a newly constructed road, it would be beneficial to have consistent facilities for active travel users along the whole length of the route rather than a sporadic offer of different status routes.</p> <p>There is desire for walkers, cyclists and horse riders to make the journey from Hattersley and Mottram to Stalybridge and vice versa by active travel means.</p> <p>The existence of the M67 and Hyde Road presents a significant severance to these users when the desire is to travel in a north/south direction. There is currently only a limited number of options for this movement without mixing with motor traffic. Whilst walkers have several options, equestrians and cyclists only have one public bridleway route. The creation of another route will give people more options thereby encouraging an increase in active travel users.</p> <p>A direct route to Roe Cross Road will also reduce the distance for active travel users when travelling from the west.</p> <p>The route should be constructed to a high standard meaning that it would be superior in condition to the other route options in the vicinity. The existing bridleway route suffers from regular flooding and water erosion and so providing another option will benefit users and</p>	No response required

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
		<p>present cyclists with a viable choice to make this journey with less on-road cycling.</p> <p><u>Disbenefits</u></p> <p>Dependant on the route chosen, the route may have to make use of existing public footpaths thereby introducing a shared use element that doesn't currently exist.</p> <p>The gradient of the natural topography of the land might present a problem to some users.</p> <p>Whilst there is potential for the route to connect to Old Hall Lane, this would be a within the gift of the applicant rather than the LHA.</p> <p>Additionally, there are developed proposals for segregated cycling lanes on Roe Cross Road under an Active Travel Fund scheme.</p>	
9.69.81	<p>LANDSCAPE, VISUAL AND GREEN BELT</p> <p>Study area, baseline conditions; overall methodology and mitigation National Planning Policy Framework and local policy</p> <p>The Applicant [REP2-021 Q5.1] has set out its consideration of the July 2021 update to the National Planning Policy Statement.</p> <p>Are the local authorities satisfied with the Applicant's explanation?</p> <p>Tameside Metropolitan Borough Council [REP2-056 Q5.7 and Q5.15] identified documents that the Applicant should consider in its assessment. The Applicant [REP3-021 pages 54 to 57] responded at Deadline 3.</p> <p>Is Tameside Metropolitan Borough Council satisfied that the Applicant has identified relevant local policy?</p>	<p>Tameside Metropolitan Borough Council are satisfied with the Applicant's explanation Tameside Metropolitan Borough Council are satisfied the Applicant's has identified the relevant local policy.</p>	No response required
9.69.82	<p>Baseline</p> <p>Tameside Metropolitan Borough Council [REP2-056 Q5.7 and Q5.15]</p>	<p>c) Tameside Metropolitan Borough Council has no further concerns about the applicants description of the study area.</p>	No response required

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>considers that the “dense urban” description in paragraph 7.5.2 of the ES[REP2-007] is not appropriate and considers that existing landscape and townscape characteristics have not been described accurately. The Applicant [REP3-021 pages 54 to 57] responded at Deadline 3.</p> <p>c) Does Tameside Metropolitan Borough Council have any outstanding concerns about the Applicant description of the study area?</p>		
9.69.83	<p>Landscape and townscape characteristics</p> <p>Tameside Metropolitan Borough Council [REP2-056 Q5.15] raised concerns about the descriptions of SLLCA 3, SLTCA 5 and SLTCA 7. The Applicant [REP3-021 pages 56 to 57] responded at Deadline 3.</p> <p>d) Does Tameside Metropolitan Borough Council have any outstanding concerns about the descriptions?</p>	d) Tameside Metropolitan Borough Council has no further concerns about the descriptions.	No response required
9.69.84	<p>Viewpoints</p> <p>Tameside Metropolitan Borough Council [REP2-056 Q5.4 and Q5.15] raised concerns about the viewpoints selected for the night-time assessment and considers that the 2km study area for visual impact omits some key theoretical viewing points. The Applicant [REP3-021 page 54] responded at Deadline 3.</p> <p>e) Does Tameside Metropolitan Borough Council have any outstanding concerns about the selection of viewpoints?</p>	e) Tameside Metropolitan Borough Council has no further concerns regarding this matter.	No response required
9.69.85	<p>Mitigation – planting</p> <p>The Applicant [REP2-021 Q5.5 and Q5.18] has said that the height and maturity of planting, screening during winter months and details of replacement trees to fill voids will be identified during detailed design.</p>	j) This remains under review by Tameside Metropolitan Borough Council.	No response required

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	j) Please could the local authorities comment?		
9.69.86	<p>The Applicant submitted an outline Landscape and Environmental Management Plan [REP3-022] at Deadline 3.</p> <p>Do the local authorities have any initial comments on the plan, including in relation to the consideration and explanation of boundary treatments, the maintenance regime, monitoring, and remedial actions during operation? Does it provide enough detail at this stage to ensure that the assessed mitigation and benefits would all be delivered?</p> <p>Please could the local authorities provide written comments on the plan for Deadline 5, on Wednesday 23 February 2022?</p>	This remains under review by Tameside Metropolitan Borough Council.	No response required.
9.69.87	<p>Design</p> <p>Key elements</p> <p>The Applicant [REP2-021 Q5.20 and Q6.2] has set out the principles of its approach for the design of key elements. In simplified terms the secured mitigation is for the detailed design to be consulted on with the local authorities.</p> <p>Please could the Applicant and the local authorities comment on the importance of the aesthetic appearance of the Proposed Development in the context of its visibility, including from residential and other receptors that currently overlook the Green Belt?</p> <p>Please could the local authorities comment on the secured mitigation? In principle, has enough detail been provided of the mitigation measures at this stage, to ensure that the assessed mitigation would all be delivered?</p>	<p>v) Aesthetics are very important for the landscape, especially in the greenbelt and it is particularly important that mitigations are fully discussed and agreed with Tameside Metropolitan Borough Council as part of the detailed design.</p> <p>w) Tameside Metropolitan Borough Council are satisfied with the Applicant's explanation at present. As set out in the Applicant's responses the elements listed are currently at the preliminary design stage and will be further developed in the detailed design stage and will seek to follow the good design principles outlined in the Design Principles for National Infrastructure and National Design Guide documents by responding to setting, place and people. It is therefore very important that the local authorities are involved in the final design in order to make sure the best possible mitigations are provided.</p>	Requirement 4(1) in the dDCO (REP6-002) expressly requires relevant local 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. This requirement will include the Design Approach Document (which will be appended to the EMP), and the Landscape and Ecological Management and Monitoring Plan (as a standalone document that is committed by the EMP).

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	Has enough consideration been given to opportunities for enhancement?		
9.69.88	<p>Aspects to be adopted</p> <p>The Applicant [REP2-021 Q5.22] said that the measures needed to secure the design of details of finishes to the scheme, street furniture and other hard landscaping would be finalised during detailed design and are secured by Article 12 of the dDCO.</p> <p>x) Are the local authorities satisfied with the Applicant's approach?</p>	<p>x) Tameside Metropolitan Borough Council is satisfied with the applicant's current approach of engaging with us during the detailed design phase to secure agreement on those elements of the scheme that are to be adopted.</p>	No response needed.
9.69.89	<p>Mitigation</p> <p>The Applicant [REP2-021 Q5.23] has set out the process that led to the development of the current design, including the involvement of a Chartered Landscape Architect, the Design Council, National Highway's Design Panel and consultation with stakeholders.</p> <p>Derbyshire County Council [REP2-051 Q5.23] have said that implementation of any or all of the measures would assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design. Tameside Metropolitan Borough Council [REP2-056 Q5.23] said that the measures would be useful.</p> <p>aa) Do the local authorities consider that an outline "design code" or "design approach document" should be developed and agreed during the Examination? Please could the Applicant comment?</p>	<p>aa) Tameside Metropolitan Borough Council consider that an outline "design code" or "design approach document" developed and agreed during the Examination would be useful.</p>	No response needed.
9.69.90	<p>Green Belt</p> <p>Inappropriate development</p> <p>The Applicant [REP2-021 Q4.1] has set out its consideration of whether</p>	<p>cc) Tameside Metropolitan Borough Council agree with the applicants approach.</p>	No response needed.

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>the temporary works could be considered inappropriate. With reference to Planning Policy Guidance, it has also set out its consideration of the impact of the proposal on the openness of the Green Belt.</p> <p>cc) Do the local authorities have any comments on the Applicant's consideration of temporary works, openness, or whether the Proposed Development would constitute inappropriate development?</p>		
9.69.91	<p>CLIMATE CHANGE</p> <p>Significant effects</p> <p>The Applicant [REP2-021 Q8.3] said that it has complied with DMRB LA 114 for the assessment of significant effects. This states that "the assessment of projects on climate shall only report significant effects where increases in GHG emissions will have a material impact on the ability of Government to meet its carbon reduction targets". The Applicant also said that there are no recognised thresholds for assessing level of significance in EIA.</p> <p>Paragraph 5.18 of the NPSNN states that "any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".</p> <p>The ExA notes that the DMRB provides guidance, while the NPSNN is national policy.</p> <p>f) Are the local authorities aware of any recognised thresholds for assessing level of significance?</p>	<p>f) Tameside Metropolitan Borough Council refer to the declaration of climate emergency made by the LA and recommend all best endeavours be made not only to maintain carbon emissions at or near current levels but to seek to reduce carbon emissions, both direct and indirect, as appropriate.</p>	<p>Please refer to National Highways Deadline 5 submission 'Applicant's response to Issue Specific Hearing 2 Item 6 c) and d) (REP5-026), with reference to the section titled 'The appropriate geographical scale of assessment of greenhouse gas emissions'.</p>
9.69.92	<p>Chapter 14 of the ES [REP1-019] states that the Proposed Development would release an additional 38,970 tCO₂e into the atmosphere during construction, and 401,026 tCO₂e over 60 years of operation.</p>	<p>h) Tameside Metropolitan Borough Council considers the 39ktonnes CO₂ emissions proposed during construction and the 401ktonnes CO₂ emitted during use to be significant. Requirements for mitigation should be considered on that basis.</p>	<p>Please refer to National Highways response to the Examining Authority's Second Written Question 8.6 (REP6-017).</p>

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>h) In the context of net zero by 2050, please could the Applicant and the local authorities comment on whether, in EIA terms, it appears reasonable for the releases to be considered “not significant”? Is it reasonable for the planning balance? Should requirements for mitigation be on the basis that there are significant effects?</p>		
9.69.93	<p>Construction materials, transport and construction processes Mitigation measures and PAS 2080: 2016</p> <p>The Applicant [REP2-021 Q8.10 and Q8.11] provided an overview of PAS 2080: 2016. It described a comprehensive process involving the pro-active participation of all stakeholders to a strategy defined by the asset owner. The process would require carbon to be quantified, reduced by applying a carbon reduction hierarchy, and managed by a Carbon Management Plan.</p> <p>l) Please could the local authorities comment on the suitability of PAS: 2080: 2016 for mitigating carbon releases from the Proposed Development during the construction phase? Should its use be secured as necessary mitigation?</p> <p>n) Do the local authorities consider that an outline of the Applicant’s strategy for the use of PAS 2080: 2016 and outline Carbon Management Plan should be developed and agreed during the Examination? What role should the local authorities have? Please could the Applicant comment?</p>	<p>l) PAS 2080:2016 is an appropriate systematic mechanism to manage the carbon emissions of an infrastructure project.</p> <p>n) Tameside Metropolitan Borough Council is committed to seeking reduced carbon emissions year on year – following the Tyndall Curve to net zero by 2038 – a collaborative approach to maximising carbon reduction, using PAS2080:2016 is welcome.</p>	No response needed.
9.69.94	<p>Operational Phase Mitigation measures</p> <p>Derbyshire County Council [REP2-051 Q8.14] and Tameside Metropolitan Borough Council [REP2-056 Q8.14] suggested that there were further opportunities to mitigate carbon during construction, including:</p>	<p>o) The applicant has evidently addressed additional carbon reduction measures however the project is still presented as emitting an additional 39ktonnesCO2 through construction phase and 401ktonnesCO2 in use. In this context tangible mitigations of carbon emissions both in use and in construction phases need careful consideration.</p>	<p>Meaningful construction phase emission reductions will be considered further through the Carbon Management Plan (REP5-023). Please refer to the Applicant’s response to Examining Authority’s Second Written Questions (REP6-017) Q8.8 for measures embedded into the design to manage operational GHG emissions.</p>

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>creating a network of cycleways and footways that would encourage active travel and reduce the reliance on vehicle use potential for renewable energy installations and generation opportunities for habitat creation and protection in relation to offsetting and resilience behavioural change and cooperation between local authorities, residents and businesses to reduce carbon emissions</p> <p>The Applicant [REP3-021 page 16] responded to Derbyshire County Council at Deadline 3.</p> <p>o) Are the local authorities satisfied that appropriate carbon-reduction measures been secured for the operational phase? If not, what other measures should be secured? Could it be helpful for the Applicant to engage with a local behaviour change group during the Examination?</p>		
9.69.95	<p>AIR QUALITY</p> <p>Study area, baseline conditions and overall methodology Climate change implications for air quality</p> <p>The Applicant [REP2-021 Q7.2] considers that adverse changes would be outweighed by a beneficial shift to electric vehicles.</p> <p>r) Are the local authorities satisfied that is a reasonable approach?</p>	<p>r) Tameside Metropolitan Borough Council consider that the approach taken is satisfactory. It is noted that the consideration of the Applicant that adverse changes would be outweighed by a beneficial shift to electric vehicles will dependent upon the future take-up of electric vehicles.</p>	<p>No response needed.</p>
9.69.96	<p>Terrain</p> <p>The Applicant [REP2-021 Q7.3] has said that adjustments for terrain have been made in accordance with DEFRA guidance. It noted that adjustments were applied when the difference</p>	<p>t) Tameside Metropolitan Borough Council consider that the explanation of how the model was adjusted to take into account terrain is acceptable.</p>	<p>No response needed.</p>

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	<p>between modelling and monitoring was greater than 25%.</p> <p>t) Are the local authorities satisfied with the consideration of terrain, including for heavy duty vehicles travelling uphill?</p>		
9.69.97	<p>Pre-commencement</p> <p>Pre-commencement activities are those that are excluded from the definition of “commence” in Article 2 of the dDCO.</p> <p>The Applicant [REP2-021 Q7.10] said that there were unlikely to be significant effects during pre-commencement and that complaint response procedures and Community Engagement Plan would be prepared and implemented prior to construction.</p> <p>x) Please could the local authorities comment?</p>	<p>x) Tameside Metropolitan Borough Council consider that the proposed approach is acceptable.</p>	<p>No response needed.</p>
9.69.98	<p>Dust mitigation and monitoring</p> <p>The Applicant submitted an outline Nuisance Mitigation Plan [REP3-010Annex B7] at Deadline 3.</p> <p>y) The Applicant [REP2-021 Q7.11] has noted that DMRB LA105 does not follow Institute of Air Quality Management guidance. Do the local authorities have a view on whether DMRB LA105 dust mitigation measures are appropriate or whether the mitigation should be in accordance with Institute of Air Quality Management guidance? Should any other recognised guidance be included in the plan?</p> <p>z) Do the local authorities have any general comments on provisions for dust mitigation and monitoring in the plan? Does it provide enough detail at this stage?</p>	<p>Tameside Metropolitan Borough Council consider that DMRB dust mitigation measures are appropriate.</p> <p>Tameside Metropolitan Borough Council consider that the level of detail provided in the plan is sufficient given that further detail will be consulted on in the EMP (second iteration).</p>	<p>Requirement 4(1) requires relevant local 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. This will include the detailed Nuisance Management Plan in Annex B.</p>

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
	aa) Please could the local authorities provide written comments on the plan for Deadline 5, on Wednesday 23 February 2022?		
9.69.99	<p>Operational phase</p> <p>Assessment for the design year of 2040</p> <p>The Applicant [REP2-021 Q7.13] said that the opening year of 2025 is expected to be the worst case rather than 2040, because increases in traffic between 2025 and 2040 would be more than offset by a shift to electric vehicles.</p> <p>cc) Are the local authorities satisfied that is a reasonable approach?</p>	cc) Tameside Metropolitan Borough Council are satisfied that this is a reasonable approach.	No response needed.
9.69.100	<p>OTHER SPECIFIC ISSUES</p> <p>Soils, ground conditions, material assets and waste</p> <p>Availability of comments from Tameside Metropolitan Borough Council</p> <p>a) It is noted that comments are awaited from Tameside Metropolitan Borough Council with regard to the contents of ES Chapter 10 [APP20 066]. When will Tameside Metropolitan Borough Council make these be available to be published?</p>	a) This remains under review by Tameside Metropolitan Borough Council. The comments will be made as soon as possible.	No response needed.
9.69.101	<p>Baseline Information</p> <p>The Applicant submitted a Hydrogeological Risk Assessment [REP3-025].</p> <p>b) Please could the Environment Agency, local authorities and other Interested Parties provide comments on this document for Deadline 4, on Wednesday 16 February 2022?</p>	b) This remains under review by Tameside Metropolitan Borough Council. The comments will be made as soon as possible.	No response needed.

Reference	Agenda Item	Tameside MBC response at REP5-031	National Highways Response
9.69.102	<p>Land use, social and economic, human health</p> <p>Local social and economic impacts</p> <p>Derbyshire County Council [REP2-045] identify potential added benefits for the scheme were it to deliver active travel routes for school routes through industrial estates (Paragraph 15.15).</p> <p>h) Would the local authorities and the Environment Agency please provide comments on each of these by Deadline 4?</p>	<p>h) Tameside Metropolitan Borough Council consider the scheme needs to ensure that the requirements of all active travel modes of transport are reflected in detailed design both along the new routes and along those roads to be de-trunked. These active travel facilities should be to the highest possible standards in order to encourage increased active travel use and to provide safe routes to and from schools in the area. The Council will continue to work closely with the Applicant in the detailed design processes, especially on the de-trunked section of the A57 through Mottram in order to take advantage of the significant reduction in traffic by providing active travel facilities. The provision of active travel facilities in the scheme will allow the extension of the existing and proposed active travel routes within Tameside to be extended to Derbyshire.</p>	No response needed.
9.69.103	<p>Other environmental topics</p> <p>The Applicant [REP3-029 Annexes B1 to B7] has submitted the following outline management plans: -</p> <ul style="list-style-type: none"> Outline Soil Resource Plan Outline Noise and Vibration Management Plan Outline Construction Water Management Plan Outline Site Waste Management Plan Outline Materials Management Plan Outline Community Engagement Plan Outline Nuisance Management Plan <p>I) Would the local authorities and the Environment Agency please provide comments on each of these outline management plans for Deadline 5, on Wednesday 23 February 2022?</p>	<p>Outline Soil Resource Plan</p> <p>Outline Noise and Vibration Management Plan</p> <p>Tameside Metropolitan Borough Council are satisfied that the Outline Noise and Vibration Management Plan has covered the relevant areas expected and that more specific information will be forthcoming in future iterations once more detailed designs are available.</p> <p>Outline Construction Water Management Plan</p> <p>Outline Site Waste Management Plan</p> <p>Outline Materials Management Plan</p> <p>Outline Community Engagement Plan</p> <p>Tameside Metropolitan Borough Council consider that the Outline Community Engagement Plan is eminently sensible and practical and we have no areas of concern.</p> <p>Outline Nuisance Management Plan</p> <p>Tameside Metropolitan Borough Council are satisfied that the Outline Nuisance Management Plan has covered the relevant areas expected and that more specific information will be forthcoming in future iterations once more detailed designs are available.</p>	No response needed.

8. REP5-034 Derbyshire County Council Post hearing written submission

Response reference:	Representation Issue	National Highways Response
9.69.104	<p>Agenda Items: Issue Specific Hearing 2:</p> <p>Derbyshire County Council was requested by the ExA during the hearing sessions to provide written comments on the following agenda items and questions.</p>	National Highways has no comment to make.
9.69.105	<p>The water environment, drainage, flood risk assessment, Water Frameworks Directive</p> <p>Baseline Information</p> <p>The Applicant submitted a Hydrogeological Risk Assessment [REP3-025].</p> <p>b) Please could the Environment Agency, local authorities and other Interested Parties provide comments on this document for Deadline 5, on Wednesday 23 February 2022</p> <p>Derbyshire County Council Comments:</p> <p>Derbyshire County Council's Flood Risk Management Team has been requested to review the Hydrological Risk Assessment but at the time of writing no comments have been received. Any comments subsequently received will be forwarded to the ExA.</p>	National Highways has no comment to make.
9.69.106	<p>Land use, social and economic, human health</p> <p>Other environmental topics</p> <p>The Applicant [REP3-029 Annexes B1 to B7] has submitted the following outline management plans: -</p> <ul style="list-style-type: none"> • Outline Soil Resource Plan • Outline Noise and Vibration Management Plan • Outline Construction Water Management Plan • Outline Site Waste Management Plan • Outline Materials Management Plan • • Outline Community Engagement Plan • Outline Nuisance Management Plan <p>I) Would the local authorities and the Environment Agency please provide comments on each of these outline management plans for Deadline 5, on Wednesday 23 February 2022?</p>	

Response reference:	Representation Issue	National Highways Response
9.69.107	<p>Outline Site Waste Management Plan Derbyshire County Council's comments:</p> <p>The Outline Site Waste Management Plan (OSWMP) includes a description of the key elements required to develop a SWMP - Waste Hierarchy, Proximity Principle, Targets, Storage, Licencing and Transport, Documentation and Monitoring (Duty of Care), Materials Management, Roles and Responsibilities, and finally, Training and Awareness.</p> <p>Given that the document refers to an outline SWMP, these sections adequately provide the basis for content anticipated in a detailed SWMP.</p> <p>Tables 1 to 3 show the duty of care information required to be collected and data associated with confirmation of targets related to the application of the waste hierarchy. The Roles and Responsibility section of the final SWMP should identify how and who will capture this information.</p> <p>Basic waste targets have been identified in the OSWMP, and it would be anticipated that greater detail will be available in the final iteration of the SWMP, breaking targets down to waste types (to European Waste Code) and the measures needed to move these up the hierarchy. This has been acknowledged in 4.1.2 of annex B4.</p> <p>Regarding waste storage, the plan identifies the basis of correct waste storage on site, again, greater detail will be required for the final SWMP, but the outline does acknowledge that this will be required and this issue should also be the subject of some training and awareness raising, that's key to making it actually work, along with inclusion of the SWMP requirements at the design stage – to 'design out' wastes from day 1 (para 1.1.7 and 1.1.8 and referenced in the Materials Management Plan).</p> <p>As an outline, the SWMP is adequate and identifies the issues and data flows needed for effective site waste management, it also references the Materials Management Plan, which will be a significant contributory factor in determining whether or not site waste can be reused, reduced and recycled effectively.</p>	National Highways has no comment to make.
9.69.108	<p>Outline Materials Management Plan Derbyshire County Council Comments:</p>	The Outline Material Management Plan has been updated following DCC's comments and resubmitted into the Examination at Deadline 6 as Annex B.5 to the First Iteration Environmental Management Plan (REP6-015).

Response reference:	Representation Issue	National Highways Response
	<p>The Outline Material Management Plan complements the OSWMP and includes the elements that would be expected (set out in Annex B5):</p> <p>Purpose, Structure, Project Team Roles and Responsibilities, Design decisions, Earthworks Materials (and balance), Land Contamination, Materials Management, Storage and Segregation, Reporting and Auditing, Movement Tracking, MMP Review, Site Inspections, Training and Supporting Documentation.</p> <p>Derbyshire County Council considers that both plans – in their outline form – are reasonably robust and they set out what is needed to manage the issue. The County Council’s main concern regarding the OMMP is the six-monthly review period. The project is expected to run for 2.5 to 3 years, given the scale and duration of the project the County Council considers that the review period should be reduced to 4 months to give greater control and reduce the risk of deviation from the MMP goals and SWMP targets.</p>	
9.69.109	<p>Outline Community Engagement Plan Derbyshire County Council Comments:</p> <p>Derbyshire County Council’s Officers have reviewed the Outline Community Engagement Plan (OCEP) and are satisfied that it provides a comprehensive and robust basis on which the applicant, via its Community Liaison Manager, will engage with the County Council on an ongoing basis prior to and during the construction phase of the scheme.</p> <p>Appropriate references are made throughout the OCEP to engagement specifically with Derbyshire County Council as host authority for the scheme or as a local government stakeholder. It is particularly welcomed that Table 4.1 indicates that Local and Community Briefings will be arranged quarterly either on-line or at existing meetings to provide updates on the scheme and development. Such meetings have been beneficial to, and welcomed by, Derbyshire County Council in respect of the A38 Derby Junctions Development Consent Order, where regular Technical Working Group meetings have been established every two months by Highways England’s consultants Linkconnex with both the County Council and Derby City Council.</p> <p>At Topic Specific Hearing Session 1 on the Draft Development Consent Order, Derbyshire County Council emphasised the importance of communication and dialog by the applicant or their consultants with the County Council on a number of matters covered by the DCO, prior to and during the construction phase, particularly with regard the disapplication of the County Council’s Street Works Permitting Scheme; any exceptional construction working hours on the scheme outside those permitted by the DCO; and any proposed day or night-time road diversions so that communication can be managed more effectively by the County Council with</p>	National Highways has no comment to make.

Response reference:	Representation Issue	National Highways Response
	the local community through its own established communication channels, particularly if community complaints are received.	

9. REP5-035 High Peak Borough Council Post hearing submission

Reference	Agenda Item	NH Response
9.69.110	<p>Base Line Noise Data</p> <p><i>High Peak Borough Council [REP2-053 Q7.8] raised concerns about the lack of baseline noise surveys within its area. The Applicant [REP3-018 paragraphs 8.35 and 8.36] responded at Deadline 3.</i></p> <p><i>c) Does High Peak Borough Council have any outstanding concerns regarding baseline noise surveys?</i></p> <p>High Peak Borough Council:</p> <p>Not significant. In response to the previous request that further monitoring should be undertaken to confirm existing baseline noise levels as part of the EMP for the scheme (to ensure that sensitive receptors in the HPBC area are correctly assigned construction noise limit values).</p> <p>The applicant has stated that Noise monitoring will be undertaken “in the area of 18 and 54 Wooley Bridge” that is representative of these properties.</p> <p>This is welcomed, but lacks detail at this stage. the EMP e.g Annex B2: Noise and Vibration Management Plan 2.6.3 notes “Woolley Bridge”</p>	<p>Please refer to National Highways’ response to Examining Authority’s Second Written Question 6.2 (REP6-017).</p>
9.69.111	<p>Night works and Section 61 consent</p> <p><i>The Applicant [REP2-021 Q9.7] said that Section 61 works would encompass all construction activities, including night time works in addition to those report in the ES.</i></p> <p><i>The ExA needs to be satisfied that the assessment considers a reasonable worst-case scenario. The REAC [REP1-037] mentions the potential for Section 61 consent.</i></p> <p><i>g) Please could the Applicant and local authorities comment on the potential for Section 61 works to result in significant effects?</i></p> <p>High Peak Borough Council:</p> <p>Section 61 is designed to help mitigate the noise impacts from construction activities by ensuring that they are conducted in line with Best Practicable Means (BPM).</p> <p>However, it does not mean that there will be no additional impacts or indeed that noise impacts will not be significant, only that the applicant will control these impacts in accordance with BPM.</p>	<p>Please refer to National Highways’ response to Examining Authority’s Second Written Question, 6.4 (REP6-017).</p>

Reference	Agenda Item	NH Response
	<p>The issue therefore, is an understanding the potential noise impacts from these various activities, when undertaken in accordance with BPM (e.g assumed embedded mitigation) and crucially the anticipated frequency of these works (para 1.34 i - ix) , to understand if it should be accounted for in the ES</p> <p>Typically, if an activity is infrequent or unexpected then section 61 then, it would not be anticipated in would be included in the assessment. However, if some of the activities listed are likely to become embedded, for example, nightly routine equipment maintenance then this should be included. There is also possibly some unknown element to this, as the application of the Section 61 is appears to be at the discretion of the Principal Contractor.</p>	
9.69.112	<p>Mitigation</p> <p><i>The Applicant [REP2-021 Q9.12] referred to mitigation measures included in the REAC [REP1-037].</i></p> <p><i>l) Please could the local authorities comment on whether enough detail been provided of the mitigation measures at this stage, to ensure the assessed mitigation would all be delivered? Should more detail be provided of the need for the extent of monitoring to be consulted on and agreed and on any follow-up actions that might be necessary? Should more detail be set out on the complaints process and interfaces with the local authority?</i></p> <p>High Peak Borough Council:</p> <p>All the above is essentially agreed but It is not clear if the level of specific detail required in the REAC, or if this could be achieved by reference/; commitment to approved methodology.</p> <p>Some of the commitments, notably as monitoring, lack any real clarity or commitment and should be more focussed. As the REAC identifies the environmental commitments made when undertaking the environmental assessment, it is also be expected that all the assumptions already made within the ES & associated assessments, will be adhered to (e.g if the ES assumes BPM for all activities – then a statement that BPM will be adopted for all activities would be expected) or the associated assessments could be compromised.</p>	<p>Please refer to National Highways’ response to Examining Authority’s Second Written Question 6.7 (REP6-017).</p>
9.69.113	<p>Other Environmental Topics</p> <p><u>7.2 Environmental Management Plan: First Iteration</u></p> <p>High Peak Borough council:</p>	<p>Please refer to National Highways’ response to Examining Authority’s Second Written Question, 6.2 (REP6-017), in relation to noise monitoring locations.</p> <p>When the piling methodology at Mottram Underpass and the River Etherow is confirmed during the detailed design, the Applicant will be able to confirm its’ proposals for vibration monitoring, including</p>

Reference	Agenda Item	NH Response
	<p>The following have been reviewed and the basic principle contained within references are made to standard methodology fine but all lack detail</p> <ul style="list-style-type: none"> • Outline Noise and Vibration Management Plan <ul style="list-style-type: none"> ○ Clarification of monitoring locations and that these represent worst case (just notes Woolley Bridge) ○ Clarification of vibration monitoring locations currently this states Vibration monitoring will take place in proximity to any impact piling activities that occur close to the proposed Mottram Underpass however, it was noted that piling may be required for the proposed river Etherow Bridge • Outline Nuisance Management Plan <ul style="list-style-type: none"> ○ Framework fine but this is quite sparse and rather ambiguous regarding monitoring ○ Consideration of flux (or deposition gauges) at high risk sites – these will need deploying prior to the commencement of activities to gain baseline) ○ (SECTION 2.53) The general inspection is fine but further detail is required in the event of an “ongoing compliant” and perhaps emphasis placed on a complaint received (from a local authority). The first line should be to address the issue and then progress to finding /correcting the cause. E.g dust from a storage area ... initial corrective action could be a wetting down / mist. Long term correction, improvement of bays or sheeting etc. 	<p>monitoring locations. If the works at the River Etherow are to be undertaken using rotary bored piling, then no vibration monitoring would be required within the High Peak Borough Council area. The vibration monitoring methodology and locations will be discussed and agreed with the Local Authorities when preparing the Second Iteration Environmental Management Plan, however, it is envisaged that the vibration monitoring would be undertaken at a small number of sensitive receptors within 50m of percussive piling sites.</p> <p>Please refer to National Highways’ response to Examining Authority’s Second Written Question, 8.37 (REP6-017), in relation to the provision of further detail on construction dust monitoring at high-risk sites.</p>

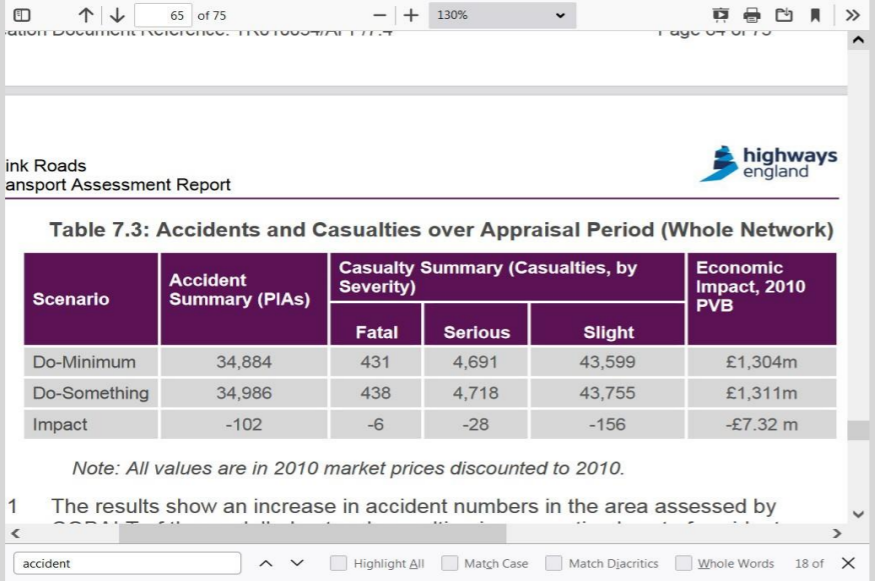
10. REP5-040 Daniel Wimberley Post hearing submission

Reference	Question	National Highways Response
9.69.114	<p>I mention this first because I believe it provides a lens through which to view what follows. It may serve to explain some of the difficulties, inconsistencies and frankly implausible predictions which you will see resulting from the model in this chapter and the next.</p> <p>The HE-modelled 2025-DM figure for the M67 J3 / J4 is almost certainly incorrect. We know this because as the charts clearly show, (slide 14) this figure is almost exactly the same as the 2015 HE ATC-based model baseline figure, and yet far less than the 2019 DfT ATC figure. This is so implausible that it is almost certainly untrue.</p> <p>All the other 2025-DM figures are therefore almost certainly incorrect also, since they have to be consistent with the M67 2025-DM figure, as this is the main route into and out of the area.</p> <p>Comparisons between 2025-DS and 2025-DM are then in turn also invalidated, because what is effectively the baseline, namely 2025-DM, is suspect. And if the baseline is suspect then the model itself is suspect.</p> <p>These comparisons are used to justify the automatic scoping out or screening out of all kinds of assessments on the grounds that the 'criteria have not been met,' such as the criterion that the 'no. of vehicles AADT must be greater by >1000.' So all these automatic scoping out or screening out decisions are also no longer valid.</p> <p>It follows that all impact assessments, insofar as they correspond to traffic volumes and composition are invalidated. FTAOD this includes but is not limited to noise, vibration, visual intrusion, accidents, air quality of all types, severance, chilling effect on active travel modes, biodiversity . . .</p>	<p>The baseline traffic model on which all the traffic modelling for the Scheme is based, is built from matrices of the current traffic demand between origins and destinations by areas or zones across the modelled area. This traffic demand is then assigned to the road network based on the model parameters, such as highway capacity, journey time and cost, junction delay etc. The traffic model is then calibrated against recorded traffic flows on links that cross defined screen lines by refining the model parameters so that the modelled traffic flows match observed traffic flows within predefined acceptable margins of error. This is done to ensure that the baseline traffic model provides an accurate representation of the current traffic flows and the operation of the road network and can, thereby, be used as the foundation for developing the forecast year traffic models.</p> <p>The baseline traffic model is calibrated against a combination of traffic flow data recorded by specifically commissioned traffic surveys and by fixed automatic traffic counters (induction loops) located across the Strategic Road Network (SRN). Traffic flows recorded by the automatic traffic counters on the SRN (Webtris data) are collected by National Highways on an ongoing basis and, therefore, provide traffic flow data over an extended period of time. These are separate to the traffic counts undertaken by the Department of Transport (DfT) that use a mixture of automatic traffic counters and manual traffic counters and are only undertaken once a year, at most, over short periods of time (typically 7am to 7pm over at most a few days) and factored up to provide an estimated annual average daily flow (AADT). The Webtris data collected by National Highways, therefore, provides a much more accurate and reliable record of current traffic flows than the DfT spot counts. The baseline traffic model has been calibrated against the Webtris data, including that recorded on the M67 which provides the most reliable and accurate traffic flow data to calibrate the model against in this location.</p> <p>The traffic modelling is also based on peak morning, inter-peak and evening peak periods, and has been calibrated against recorded traffic flows for these periods, not daily flows. The daily traffic flows used in the assessment of the Scheme are derived by factoring up these peak period flows. This factoring will also introduce discrepancies in any comparison with the DfT count point data.</p> <p>Furthermore, the method used for the DfT count point on the M67 switched from manual counts to automatic counts in 2017 and the recorded traffic flows have risen since this switch, particularly for HGV movements, which seemingly increase by 24%. It is likely that the method of traffic recording itself may in part be responsible for this increase, as the two counting methods have different levels of accuracy, especially regarding vehicle classification.</p> <p>For the reasons stated above it is not appropriate to compare modelled traffic flows with DfT traffic counts and, consequently, the assertion that the traffic modelling is incorrect based on this comparison is not valid.</p>
9.69.115	<p>The charts show up problems which point to the fact that the way the model works and what it is suggesting will happen are questionable.</p> <p>Anomaly 1: on the A628 route there is a very large drop in predicted flows between Market Street in Hollingworth and Tintwistle, which is hard to explain as they are adjacent settlements. (slides 14&15; 18&19)</p> <p>Anomaly 2: on the A57 route between Glossop High Street East and Snake Pass there is a huge drop in predicted flows, which is even harder to explain. (slides 24&25)</p>	<p>The traffic flows on the A57 Glossop High Street East and A628 Market Street are higher than the traffic flows on the sections of these roads through the Peak District National Park (PDNP) because of the additional traffic demand generated within the urban areas of Glossop, Hollingworth, Tintwistle and Hadfield. This additional traffic demand is predominantly for journeys to and from destinations to the west, rather than across the PDNP and, therefore, results in significantly high flows on these sections of road compared to the sections of road through the PDNP.</p>

Reference	Question	National Highways Response
9.69.116	<p>... 1 The DM-2025 flow predicted for the M67 J 3 / 4 location cannot be correct.</p> <p>If this is true then the entire model is put in doubt, and so I myself was in doubt over it. It seemed extraordinary that this could be possible. Maybe there was a way that HE's 2015 counts-based figure could be the same as the figure predicted by the model for DM-2025?</p> <p>I went into a loop of researching whether traffic on roads similar to the M67 or A57 had been static from 2015 onwards up to the pandemic. Then it could make sense that a DM-2025 modelled figure might actually be the same as the 2015 counts. In the Road Traffic Estimates in Great Britain – 2019 I found official Department for Transport (DfT) graphs showing the growth in traffic on motorways, on urban A roads, and on the SRN. ¹</p> <p>But I needn't have bothered. Having done all this research I went back and had another look at the relevant bar chart (<i>slide 14</i>). The answer was right there staring me in the face. ² The 2019 figure, which is a Department for Transport automatic traffic count (ATC) figure, is far higher (24% higher) than the 2015 HE baseline figure.</p> <p>And so the conclusion stands. It is utterly implausible that DM-2025 should be the same as HE2015, and therefore it is virtually certain ³ that the DM figure is wrong.</p>	See response to 9.69.114 above.
9.69.117	<p>The anomalies.</p> <p>The two anomalies – items 6 & 7 in the list of key messages above – share the same pattern. In both cases, the traffic flows predicted for Tintwistle and the road towards Snake Pass, the one sensitive at this examination because it is an AQMA, and the other sensitive at this examination because it crosses a National Park, are lower or far lower respectively than the flows immediately to the west of them.</p> <p>So at Tintwistle, the DM-2025 flows are predicted to be 6250 (39.2%) lower than the flows at Hollingworth Market Street just a few hundred yards to the west on a continuous road with no major junctions, while the DS-2025 flows are predicted to be 5240 (33%) lower. The DfT figure for the same locations is a gap of 2884 (19.8%) (slides 14 & 18)</p> <p>There is something going on here, but whatever it is goes on far more in the modelled flows than in the DfT counts. How can this increase in drops in flow between Hollingworth and Tintwistle be explained?</p> <p>Response 4: See response 2 above.</p>	See response to 9.69.115 above.
9.69.118	<p>Snake Pass</p> <p>In the same way, but much more dramatically, traffic between Glossop High Street East and Snake Pass seems to miraculously disappear in vast</p>	See response to 9.69.115 above.

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	<p>quantities. (slides 24 & 28) There are no obvious origins or destinations for the approximately 11,500 missing vehicles.</p> <p>So it appears that we have here at least one and possibly two examples of MMMC's to go with the one at Market Street in Mottram. 4 Note that an MMMC is a Massive Magic Manhole Cover.</p> <p>Here are tables of these figures for the two locations:</p>	
9.69.119	<p>The rat runs or “alternative routes.”</p> <p>The charts (slides 24&25; 28&29) show clearly that Glossop High Street West (an AQMA) traffic is modelled to fall a lot while High Street East traffic is modelled to rise a lot, when compared to 2019 DfT figures. 5</p> <p>We now know that this is due to traffic being routed by the model to rat runs or “alternative routes” and thus the model shows the traffic flows being removed from the A57 south of Brookfield Road and as far as the main crossroads in the centre of Glossop, and with that, from the Dinting Vale AQMA.</p> <p>the rat runs were unknown to the public at consultation stage</p> <p>The first point to make is that HE failed to inform the public about a plan which would route thousands of extra vehicles through the back streets of Glossop, if the scheme were to be built. This alone makes the consultation carried out in November/December 2020 invalid.</p> <p>Mr. Bagshaw said that local residents in Glossop had been “disenfranchised” by the actions of Highways England. They were indeed disenfranchised and I return to this whole question of lack of information from HE – its huge extent, and its effects - in Chapter 5 check all “chapter” mentions in doc of this submission.</p> <p>I can imagine that HE might dispute the use of the words “their plan to route thousands of extra vehicles through the back streets of Glossop” in the paragraph above. Was it as a result of an intention that this increase in traffic on Glossop’s back streets will occur if the road is built? Or was it merely a prediction based on already observed behaviours – namely that drivers can and do use these rat runs currently?</p> <p>Whether it was an intention or a prediction the result is the same – HE are counting on an increase in traffic on the back streets, whether it is encouraged by signage, or left to just “happen,” an increase which serves to reduce the traffic predicted to flow into the Tinting AQMA and thus lower the traffic there to below the threshold which would trigger a specific AQ assessment and/or below the level which would mean illegal levels of pollution.</p>	<p>Additional information on the changes in traffic flow on Dinting Road and Shaw Lane due to the Scheme has not been withheld and has been provided by National Highways during the DCO Examination as soon as requested. See National Highways’ comments RR-0240-15 and RR-0751-1 on Relevant Representations (REP1-042). The increase in traffic flows on Dinting Road and Shaw Lane due to the Scheme are due to additional traffic demand routing along these roads to avoid traffic congestion and delay on the A57 Glossop High Street.</p>
9.69.120	<p>Pg.18 1. Accidents Baseline Scope of TAR’s “study”</p>	<p>The forecast impact of the Scheme on accidents doesn’t just consider the roads shown in Figure 3.8 of the Transport Assessment Report (TAR) (APP-185). The forecast impact of the Scheme on accidents considers potential changes in accident rates on all roads within the area of detailed traffic modelling, which includes all roads that could be used to a lesser or greater degree for through trips and, therefore,</p>

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	<p>Under the heading "Existing Issues," the TAR presents basic accident data both in table form and plotted onto a map for the road network (paras. 3.7.3 to 3.7.6).</p> <p>In paragraph 3.7.4 we read:</p> <p>"The study area used for assessing the baseline accident data is set out in Figure 3.7. The geographical extent of the study area is in line with the study area outlined in Figure 3.1. It is considered that, by using this study area, the analysis will capture the major roads through the area and omit residential roads, upon which the scheme is not expected to have an impact. A 20m buffer from these roads has also been added in order to capture any accidents that may have occurred on junctions joining the roads (my emphasis) Here is the Figure referred to above, showing where the accidents happened in the "study area".</p> <p>From this we see that the TAR writers have drawn the extent of the area they will study in a way that excludes residential areas, on which the scheme "is not expected to have an impact". And yet</p> <p>with the same publication date of June 2021, the ES Appendix 2.1 clearly shows the increased flows on certain key residential roads within Glossop. Increased flows, according to the TAR, 11 lead to more accidents.</p> <p>According to HPBC, in their LIR at para. 7.33 there are indeed predicted to be extra accidents on Glossop residential streets due to the scheme:</p> <p>"ROAD SAFETY AND COLLISIONS</p> <p>accident rates</p> <p>"7.33 The scheme is forecast to have the largest impacts on the A57 Snake Pass - situated immediately to the east of Glossop. This will create negative impacts for journeys eastward to / from Sheffield along the A57 due to the scheme, with an estimated accident impact of approximately £-3.5m along the A57 and approximately £-.5m to £-1m along Shaw lane / Dinting Road through Glossop."</p> <p>Why is there no mention in the TAR of these accidents valued at between half a million pounds and one million pounds along just one residential street in Glossop? How many of these streets are routes to school? How will the threat of these accidents support the government's desire to promote active travel for all of its many benefits?</p>	<p>potentially subject to changes in traffic flows due to the Scheme. Minor roads that are not considered to accommodate through traffic, many of which are likely to be residential streets, are excluded from the traffic model and are therefore also excluded from the accident analysis. This is on the basis that they will not be subject to changes in traffic flows or accident rates, due to the Scheme.</p>
9.69.121	<p>Why do we have to depend, in this EiP, on detective work by a stakeholder, to learn what we should have been told by the applicant?</p> <p>Going a bit beyond the TAR, but absolutely on the same point, we read in the Summary Comments of the HPBC LIR the following (fancy bullet point 8):</p> <p>"Severance and safety for non-motorised users. The increase in traffic and congestion through Glossop could pose a safety concern in relation to key</p>	<p>The impact of the Scheme on severance and safety for non-motorised uses has been assessed within the Environmental Statement. What has not been assessed in the Environmental Statement is the potential effect that any changes in severance and safety for non-motorised uses could potentially have on town centre vitality, since this a potential economic impact, rather than an environmental impact.</p>

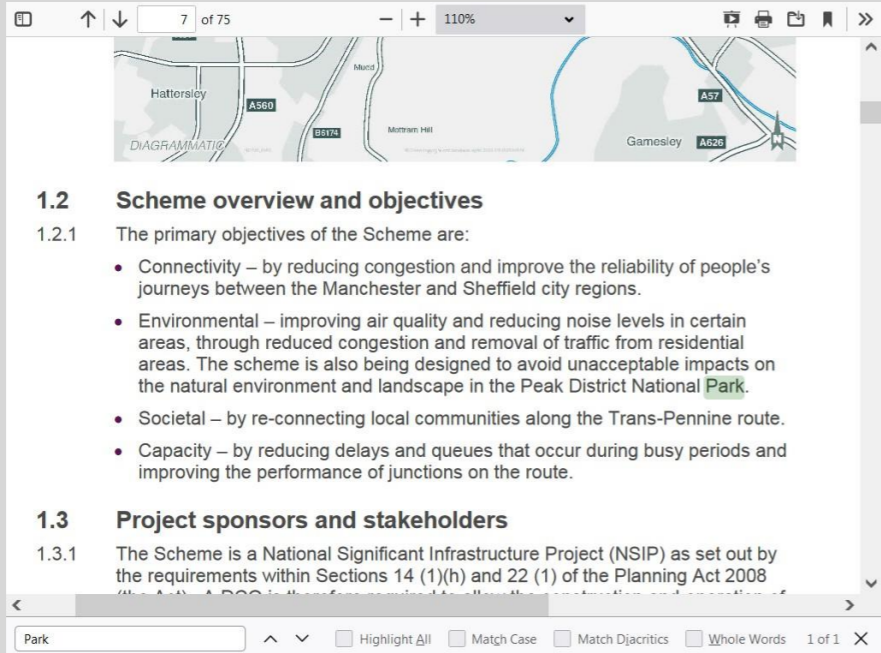
Reference	Question	National Highways Response
	<p>school walking routes and affect shopping habits within the town centre – potentially affecting town centre vitality. This is not considered in the ES.”</p> <p>So not only does the applicant’s TAR ignore this matter but so does the ES. Could the ExA ask the applicant why this omission has occurred and whether it is compliant with the EIA regulations? (EXA Request)</p>	
<p>9.69.122</p>	<p>Basic error in the information</p> <p>I copy below TAR Table 7.3 which tabulates the accidents actual and predicted on the network</p>  <p>The column showing fatal accidents gives a figure of 431 fatal accidents in the Do-Minimum scenario and 438 fatal accidents in the Do-Something scenario. It gives the difference between 438 and 431 as 6. This is not correct. And with fatal accidents there is no such thing as a rounding error.</p> <p>How can this error have slipped through any checking process? How can this error even have been made? This table presumably comes from a spreadsheet. And so my mind is filled with disquiet and so should yours be. See my comment on the Rogoff spreadsheet error in my DL 1 Submission.</p>	<p>The discrepancy in the number of fatal accidents presented in Table 7.3 of the TAR is due to rounding of decimal places. The analysis of forecast accident rates is based on forecast averages per year over 60 years, so it is appropriate to use decimal places for this analysis.</p>
<p>9.69.123</p>	<p>ALTERNATIVES</p> <p>At the ISH 2 hearing on Wednesday 9th February, I remember that you asked HE, under the heading of “Traffic Modelling” about traffic restraint etc. – it was Item 3 question d).</p> <p>HE’s representative went into a long digression about HGV’s and totally ignored the wider and deeper questions you had posed about restraint of motor vehicles, encouraging active travel, and promoting routes which avoid the National Park. In other words he avoided the question of alternatives to the scheme, even though they are mandated by both NPS-</p>	<p>The purpose of the TAR is to explain the traffic and transport related impacts of the proposed Scheme. The alternative to the proposed Scheme considered by National Highways and the justification for their rejection are set out in Chapter 3 of the Environmental Statement (APP-060).</p>

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	<p>NN in general terms, and by the Environment Act 1995 and government circulars 4/76 and 125/77 in relation to the protection of National Parks. 12</p> <p>This Chapter's sections on buses and rail will look at what the TAR says about the existing situation of these two elements and the potential there is for improvement. This section however looks at the consideration given by the TAR to alternative solutions taken in the round.</p> <p>The scheme that is being put forward at this examination suffers from a multitude of problems many of them backed by legal requirements. I hope to list these legal requirements at another deadline, but for now I will just list the problems:</p> <ul style="list-style-type: none"> The impact on climate change; The impacts on residential streets; The failure to solve the problems of Hollingworth, Tintwistle and Glossop, The problems surrounding air quality; The impacts on the National Park; Impact on the green belt <p>The extra ordinary cost when all these problems are taken into account, pre-empting other better expenditure</p> <p>And so you would think that a responsible applicant, in line with the relevant guidance, (see footnote 2) would take a serious look at specifying and assessing alternative solutions.</p> <p>Here is a simple list of what the TAR could have and should have considered:</p> <ol style="list-style-type: none"> 1. Whether and to what extent the existing bus service could be improved 2. Whether and to what extent the existing rail service could be improved 	
9.69.124	<p>3. BUSES</p> <p>"The local area is well served by buses" declares the TAR. There then follows a table which states that from Glossop to Manchester city centre there is one bus per day, from Glossop to Hyde there is one bus per hour, from Hollingworth to Broadbottom there is one bus per day and so it goes on. There follows a map at figure 3.5 which displays bus frequencies incorrectly and which omits the 341 bus service bypassing Mottram Moor to the south namely the Glossop - Hyde service. 13</p> <p>The section concludes with the extraordinary statement at paragraph 3.4.1: "It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion." We know of course that this simply is not true (see the section on Journey times), so what is it doing in the TAR?</p> <p>That is a serious question. How can such a misleading statement find its way into the Transport Assessment?? What value can we put on any of</p>	<p>Further detailed information on the anticipated impacts of the Scheme on bus journey times is being submitted into the DCO Examination by National Highways at deadline 7 in its response to question 3.17 in the Examining Authority's Second Written questions.</p>

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	<p>this? Why are they seemingly so intent on gilding the lily? This is not a selling job, is it? It should be a government agency setting out what it reckons to be true so that a good decision can be arrived at.</p> <p>However, looking at the positive side, it is abundantly clear that there is vast scope for improvement for bus services in the area. My chapter on Alternatives in Chapter 4 of my Deadline 2 submission sets out the first steps one would take to achieve such an improvement. (page 19 in "NOTES ON THE ABOVE")</p>	
9.69.125	<p>4. CLIMATE CHANGE</p> <p>The phrase "climate change" does not occur in the TAR. Nor even does the word "climate" Enough said!</p> <p>Still, a few words should be said. It is absolutely extraordinary that a document calling itself a Transport Assessment Report and written in 2021, when a Climate Emergency has been declared, could have no reference at all to climate change. We are told nothing about the immediate consequences for the climate of constructing his scheme. We are told nothing about climate consequences of this scheme in its operational phase. And yet of course both contribute to filling the carbon bucket which this nation has at its disposal.</p> <p>The bucket is finite and set down in statute. We can emit only a limited quantity of CO2 and other greenhouse gases. If the scheme were to be built then other perhaps worthier candidates for making emissions would be set aside.</p> <p>For the reason of impact on climate change alone, this scheme should be evaluated against alternatives. I would only add that in the 790 page document which was released by CPRE and which sets out the technical background to the modelling, the phrase "climate change" does not appear once.</p> <p>The applicant appears to have a blind spot as big as an asteroid when it comes to climate change. I know that you have now asked the applicant to do a proper assessment into the climate impacts of the scheme in its context but the fact remains that we have here a scheme which is being put forward by an agency which seems blissfully unaware of what climate change means for the country as a whole and for the future of this scheme in particular., at a time when government is ratcheting up commitments on climate change in every relevant policy announcement.</p>	<p>The purpose of the TAR is to explain the traffic and transport related impacts of the proposed Scheme. The environmental impacts of the Scheme are presented in the Environmental Statement, with the impact on climate change presented in Chapter 14 (REP1-019)</p>
9.69.126	<p>6. HGV's</p> <p>The percentage of HGVs in the traffic along the A628 is fantastically high at around 1 in 7 of all vehicles but their impact on people, on communities, on the general environment, and even on the fabric of buildings is out of all proportion to their number.</p> <p>So one would expect in a document called Transport Assessment Report some facts about past and recent trends in HGV numbers and behaviour,</p>	<p>HGVs have been properly considered in the assessment of impacts of the Scheme. The Scheme is forecast to result in a very significant reduction in HGVs using the existing A57 between Hollingworth and the M67, with HGVs switching to the new Link Road. Elsewhere, the Scheme is not forecast to significantly alter the proportion of HGVs using any roads across the modelled road network, i.e. where traffic flows are forecast to change due to the Scheme, then the number of HGVs is generally forecast to change in proportion to the change in traffic flow.</p>

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	<p>some consideration of likely or possible future trends, some assessment of specific impacts, and the potential future for these impacts, and assessment of how numbers of HGVs travelling through this area could be reduced whether by improved logistics, by increased use of rail, or by other policy levers, but there is nothing at all about any of the above.</p> <p>There is not even any suggestion that AAWT might be a better metric than AADT on many occasions when discussing traffic flows and traffic impacts. AADT, by being an average figure which includes both night-time and weekend, flattens the figures; it stretches out the impact over a longer time. It does not paint as accurate a picture of what people experience most of the time as AAWT, and in AAWT the percentage of HGVs, for example in Hollingworth, is substantially higher (see ES figures in Appendix 2.1) zzz check this!!!</p> <p>The clearest indication that something is not right in this treatment of the subject of HGVs is the fact that there is no discussion whatsoever of the possible diversion of HGVs into the planned rat runs in Glossop such as Shaw lane/Dinting Road or the Hadfield Alternative.</p> <p>The only commentary on HGV's in the TAR is a broad-brush analysis of freight movement, at one period of day, namely inter-peak, of their origins and destinations by region. That is the sole consideration given to HGVs in the area despite the enormous harm that they cause. The section on Alternatives discusses what proper consideration of HGV's within the context of an overall alternative, would look like.</p>	
9.69.127	<p>5. GLOSSOP</p> <p>This section simply allows me to point out all the occasions where Glossop is simply ignored.</p> <p>If you search for the word Glossop in the TAR you will find out that it has a railway station and a bus station. There have also been many improvements made to the process of gathering traffic data in Glossop. It is also mentioned in the many journey time calculations from Glossop away to the west involving the new link roads. It is also mentioned once in connection with accidents – “a small increase in accidents is expected through Glossop” - as it is coyly put in para. 7.2.13</p> <p>There is no mention of the problematic diversion of thousands of vehicles into the residential streets of Glossop. The phrase “through Glossop” in the sentence I quoted just now suggests that the accidents would be on the main road. It is a careful avoidance of the real issue which is that accidents are predicted to increase along Shaw Lane and Dinting Road.</p> <p>So although there are many mentions of improvements to the model made in data collection in Glossop, there is no mention whatsoever of the various alternative routes being “planned” 14 by HE to the main A57 through Glossop.</p>	See response to 9.69.119

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	<p>So the additional accidents which are to be expected as a result of diverting this traffic through residential streets, the time delay experienced by passengers on the buses using streets which now see additional traffic, the inconvenience and anxiety of crossing roads which are now far busier than they were, the additional noise and pollution; this is all airbrushed out of existence.</p> <p>Transport Assessment Report? I think not.</p>	
9.69.128	<p>7. JOURNEY TIMES</p> <p>Longer routes journey times</p> <p>We have been repeatedly told that the rationale for this scheme is mainly that it improves connectivity between Manchester and Sheffield. A key element of this is journey times. Another is reliability which I deal with in a separate section.</p> <p>So if the journey time between Manchester and Sheffield is such a critical part of the justification for this scheme; indeed along with reliability it is its <i>raison d'être</i>, then one would expect the Transport Assessment Report to quantify the reduction in journey times that the scheme might bring and in particular to consider the two ends of the journey – how long does it take to get from the point at which one enters the destination city to one's final destination within that city?</p> <p>But having read this far you will not be surprised to learn that there is nothing in this report. There is no assessment of overall journey times, there is no assessment of all the factors which might influence journey times, there is no assessment at all.</p> <p>So what are we to make of this key claim, that connectivity will be improved and therefore employment opportunities, economic growth etc. will follow?</p>	<p>The economic assessment of the Scheme includes all the journey time changes along the entire route for every trip within the Area of Detailed Modelling (ADM), including from Manchester to Sheffield. It is only trips which don't pass through the ADM (e.g. Sheffield to Sheffield) that are excluded from the economic assessment, as these are not considered material to the assessment of the Scheme. Please also refer to National Highways' comment 7.27 on Derbyshire County Councils' Local Impact Report (REP3-018) and comment 9.54.64 on Keith Buchan's Deadline 4 submission on behalf of CPRE PDSY (REP5-022), specifically regarding changes in journey times between Sheffield and Manchester due to the Scheme.</p>

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	<p>But maybe this claim does not exist. I have just checked the consultation brochure for the 2020 community consultation. The phrase “journey time” is nowhere to be found. Instead the document uses the more vague phrase of “reliability.” Maybe they knew that the claim of improved journey times could not be made to stack up. The TAR itself lists the objectives of</p>  <p>the scheme as follows:</p> <p>They do not hang their hat on journey times being reduced, only on “reliability”!</p> <p>I would ask the ExA to be very wary indeed of claims around journey time and to ask the applicant specifically about what they believe the truth to be about journey times between origins and destinations in the two cities of Sheffield and Manchester as it seems that HE themselves have little to say on this matter. (Request to ExA)</p> <p>Yet I feel sure that it forms part of their “case” – ah, I have remembered. It pops up in their Economic Appraisal, as follows:</p> <p>7.2.3 The Scheme is forecast to produce benefits of £156m (PV) by the end of the 60- year appraisal period. These benefits are generated by:</p> <ul style="list-style-type: none"> • Travel time savings, vehicle operating cost and user charge benefits of £181m; • <p>So there you have it. Journey time savings are a big part of the economic appraisal for the scheme. But if that is so, then it is vital that HE be asked to produce the evidence. This evidence should be in the TAR, but it isn't.</p>	

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9.69.129	<p>RELIABILITY</p> <p>The truth about reliability</p> <p>The TRANS-PENNINE ROUTES FEASIBILITY STUDY STAGE 1 REPORT, FEBRUARY 2015</p> <p>describes in detail the factors which lead to the unreliability of the Transpennine route. One is road closures, which is obvious to anyone who knows these routes. As the report says (para. 1.2.4):</p> <p>“1.2.4 The trans-Pennine routes face a number of operational challenges. The HA’s A57/A628/A616/A61 strategic route experiences a road closure every 11 days on average with two third of these being longer than two hours and some 77% of these closures are the result of either road traffic collisions or bad weather. The non-trunk routes are also prone to weather-related closures.”</p> <p>Having done the detail, the report summarises as follows:</p> <p>“1.3 Current Challenges and Priorities</p> <p>1.3.1 The challenges identified have been prioritised to ensure that the next stages focus on the most important problems faced by the trans-Pennine routes. An assessment</p> <p>has been made on the basis of whether the challenges have a direct impact on connectivity between Manchester and Sheffield. The following is a summary of these high priority challenges:</p> <ul style="list-style-type: none"> • Journey-times are increased by delays at junctions and the geometry and topography of routes; • Long term traffic growth will bring some urban sections of routes to their capacity. • Accidents reduce journey time reliability, with high accident rates on some routes and a number of accident clusters; • Severe weather causes road closures which reduce journey time reliability; • Maintenance on single carriageway sections reduces journey-time reliability; • Asset condition, including the standard, age and damage to infrastructure, reduce journey-time reliability through significant maintenance operations and risk from closures; and, • There is a lack of technology to assist in the operation and management of the routes and provide information for travellers” <p><i>(my emphasis)</i></p> <p>The second bullet point alone is arguably addressed by the scheme before us. Not one of the others is mentioned in the TAR. Why is this?</p>	<p>It’s not possible to quantify likely changes in journey time reliability due to the Scheme. However, it has been established that when a road network is operating close to or at capacity, then small increases in traffic demand will often cause exceedance in capacity which results in swift and exponential growth in traffic congestion and delay. Consequently, relatively small fluctuations in traffic demand on a road network operating close to or at capacity, such as along the A57 through Mottram, can significantly alter levels of traffic congestion and delay and thereby, result in poor journey time reliability. The Scheme will increase road capacity on the A57 between Hollingworth and the M67 to accommodate forecast traffic growth, with most of the road network in the vicinity of the Scheme forecast to operate within capacity. Consequently, the Scheme will make this section of road network less sensitive to congestion and delay from fluctuations in traffic demand and, therefore, it is anticipated to improve journey time reliability.</p>

Reference	Question	National Highways Response
	<p>I would suggest that it is because the scheme does not and cannot address any of these issues.</p> <p>But it is dishonest, in a transport assessment, to ignore these. The reader is misinformed by omission.</p> <p>Note that the writer of the TAR is aware of this report, citing it when dealing with severance (at para. 3.7.14).</p> <p>The importance of reliability in the case for this scheme</p> <p>And yet reliability is the feature of the scheme which gets top billing in the objectives listed at paragraph 1.2.1 of the TAR, linked to the magic word “connectivity”:</p> <p>“1.2.1 The primary objectives of the Scheme are:</p> <ul style="list-style-type: none"> • Connectivity – by reducing congestion and improve (sic) the reliability of people’s journeys between the Manchester and Sheffield city regions” <p>And it was the first promise which the scheme’s promoters made to the public in the Consultation Brochure (page 8):</p> <p>“The scheme will:</p> <p>Reduce congestion and improve the reliability of people’s journeys – through Mottram in Longdendale and between Manchester and Sheffield”</p> <p>This makes it all the more shocking that the TAR simply ducks the issue. Is this an assessment or a sales brochure? Please will you insist that HE explain the absence of any proper assessment of this aspect of the scheme, given its importance? (Request to ExA)</p> <p>Further information</p> <p>For the sake of completeness, I give a blow by blow account of the references to “reliability” in the TAR in an Appendix to this Chapter.</p>	
9.69.130	<p>10. SEVERANCE</p> <p>In a section in the TAR entitled “existing issues” we read this (para. 3.7.14):</p> <p>“Earlier studies, including the Trans-Pennine Routes Feasibility Study Stage 1 Report (2015), identified severance and issues for vulnerable users in urban areas of the A628 and non-trunk A57 and A628, including the A57 through Mottram and Hollingworth. The high volume and high percentage of HGVs and associated noise and air quality issues are a deterrent to pedestrian/cycling trips along and across the A57. The Scheme will reduce the volume of traffic and percentage of HGVs on the existing A57 through Mottram and will enhance pedestrian and cyclist provision within Mottram.”</p> <p>The issue of severance is an important one and affects many roads throughout the area, in different ways. In some places such as the A57</p>	<p>Please refer to National Highways’ response 3j & 3k in the Written summary of Applicant’s case at Issue Specific Hearing 2 (REP4-008).</p>

Reference	Question	National Highways Response
	<p>down from the Gun Inn towards the centre of Glossop the issue is getting across the road at all, due to the traffic volumes. In other places, the issue is very light flows leading to higher speeds by motorists and consequent fear and danger, as is cited in a recent DL 4 statement, by a newcomer to the EiP. (Emma Kane submission, library REP4-018)</p> <p>There are of course roads where the traffic will be reduced, were the scheme to be built, and others, as we are now all aware, where it will increase – both posing different problems.</p> <p>None of this is reflected in the TAR. You would not know about the continuing problems in Tintwistle, for example, where, we are informed in the 2015 report cited above, 15 the accident rate is particularly high:</p> <p>“1.2.11 The A628 also experiences a high number of pedestrian accidents within the urban section through Tintwistle at its western end.”</p> <p>How is it that the 2015 report can tell us about pedestrian accidents in Tintwistle (and anyone who has stood alongside the road in Tintwistle as I have can understand how this could be) and the TAR says not a word?</p> <p>How is it that there is no discussion of the extra traffic to be loaded onto Dinting Road/Shaw Lane?16</p> <p>The TAR’s only message on severance is “The Scheme will reduce the volume of traffic and percentage of HGVs on the existing A57 through Mottram and will enhance pedestrian and cyclist provision within Mottram”</p> <p>This is indeed a very severe case of tunnel vision. I can only shake my head in disbelief that such a document can be before this examination.</p>	
9.69.131	<p>11. TRAINS</p> <p>In section 3.4 the TAR sets out the existing situation with regards to rail passenger services. It lists the frequencies on the Hope Valley line to various destinations and it gives journey times between Manchester and Sheffield. It also shows where the railway stations are in the area, says what the frequency is into Manchester and lists existing patronage of the stations. And that is all.</p> <p>There is no analysis, not even a mention, of the potential for modal shift to rail. The TAR tells us that the frequency into Manchester from Glossop is 2 trains per hour. Could this be increased? Are the necessary paths available? If they are not available now are they likely to be available in the near or medium-term future under existing expansion plans? What might the effect be of different amounts of modal shift to rail on the road network, in particular on congestion and on air quality, but also on all traffic nuisances? What is the policy environment with regard to rail, both at regional level (Greater Manchester, Sheffield City, Transport for the North) and national level?</p> <p>Looking more specifically at the Trans Pennine connection between Manchester and Sheffield, what will the impact be of the capacity scheme</p>	<p>Please refer to National Highways’ response to question 3.3 of the Examining Authority’s Second Written questions (REP6-017).</p>

Reference	Question	National Highways Response
	<p>now being implemented on the Hope Valley line? This scheme is not even mentioned in the TAR. What is the potential of this line for freight now that more pathways will become available? What capacity will this line have for passenger movement? What will the new journey times be for through services? To what extent is the rail connection more reliable than The Snake Pass and the Woodhead pass? Are there other advantages which might attract commuters and other travellers to rail and away from road?</p> <p>There is not a word about any of these matters in the TAR.</p> <p>I have covered the significance of Rail in the broader context of constructing a better alternative to the scheme and why this should be before this examination, in the section on alternatives.</p>	

Appendices

Appendix A. Optimistic Development log list

Uncertainty Log- Additional developments for Optimistic Scenario

ID	Ref	Local Authority	Scheme	Forecast Developments for 2015-2025	Forecast Developments for 2015-2040	Development Type
2	H-MOSSLE-012	Tameside	Plevins Cheshire Street	0	155	Housing
10	H-STANTH-032	Tameside	West Stalybridge Market Street and Caroline Street	0	247	Housing
13	H-STASTH-021	Tameside	Oakwood Mill and Land around stayley cricket club, Millbrook	0	126	Housing
26	H-DENSTH-022	Tameside	Two Trees school 101 two trees lane	0	274	Housing
27	GMA44	Tameside	GMA44 South of Hyde	0	442	Housing
28	H-DUKSTB-023	Tameside	Castle Street Car Park West of Resturant	51	51	Housing
32	GMA43	Tameside	Godley Green	0	2350	Housing
58	Multiple Site Refs	Tameside	St.Petersfield Buildings	9946	27588	Employment
60	DU510	Tameside	Cleared Land, Ashton St/ Gate St, Dukinfield	0	3967	Employment
68	ST551	Tameside	Former Total Petrochemicals site, Globe house, Bayley Street	10626	13283	Employment
69	HY502	Tameside	The Thorns, Hattersley, Hyde	0	12655	Employment
70	HY522	Tameside	Tract of land, Talbot Rd/ Victoria St, Hyde	0	1716	Employment
73	AS526	Tameside	Ashton Moss Plot 3000, Lord Sheldon Way, Ashton-under-lyne	0	37161	Employment
74	AU506	Tameside	Moss Way/ Audenshaw Road, Groby Road North/ Hanover Street	0	17058	Employment
78	GMA42	Tameside	GMA42 Ashton Moss West	0	160000	Employment
84	125	Manchester	Jacksons Brickworks Briscoe Lane	200	200	Housing
85	59f	Manchester	Hyde Road	55	272	Housing
90	85	Stockport	Adswood Road/Siddington Avenue SK3 8LF	67	67	Housing
95	28.8.21	Stockport	GM Allocation High Lane	0	500	Housing
98	28.8.22	Stockport	Stanley Green - GM Allocation	0	850	Housing
99	OA23	Stockport	Heald Green - GM Allocation	0	850	Housing
100	21	Stockport	Woodford aerodrome, Chester Road, Woodford, SK7 1QR	520	920	Housing
101	28.8.20	Stockport	Woodford - GM Allocation	0	750	Housing
103	HS38	Barnsley	Land off Cudworth Bypass	0	192	Housing
104	HS37	Barnsley	Land north of Sidcop Road, Cudworth	0	18	Housing
105	HS40	Barnsley	Land north of Oak Tree Avenue	0	38	Housing
106	HS32	Barnsley	Land off Pontefract Road	40	147	Housing
107	HS36	Barnsley	Land at Weetshaw Lane, Cudworth	0	144	Housing
108	HS39	Barnsley	Land west of Three Nooks Lane, Cudworth	20	41	Housing
109	HS34	Barnsley	Land north of Blacker Lane, Shafton	0	169	Housing
110	HS8	Barnsley	Site West of Wakefield Road, Mapplewell	224	374	Housing
112	HS2	Barnsley	Land south of Darton Lane, Staincross	86	86	Housing
113	HS11	Barnsley	Land South of Bloomhouse Lane, Darton	94	214	Housing
114	HS25	Barnsley	Land to the east of Woolley Colliery Road	0	118	Housing
115	HS1	Barnsley	Former Woolley Colliery	0	90	Housing
117	HS33	Barnsley	Land west of Brierley Road, Grimethorpe	0	61	Housing
118	HS17	Barnsley	Land west of Wakefield Road	112	232	Housing
119	HS12	Barnsley	Site north of Carlton Road	86	86	Housing
120	HS16	Barnsley	Site to the east of St Helens Avenue	96	96	Housing
123	HS7	Barnsley	Land east of Burton Road, Monk Bretton	98	218	Housing
129	HS75	Barnsley	Land south of Halifax Road, Penistone	120	414	Housing
130	HS74	Barnsley	Land south of Well House Lane	80	132	Housing
131	HS78	Barnsley	Land to the south of Doncaster Road, Darfield	121	441	Housing
132	HS79	Barnsley	Former Foulstone School Playing Fields	69	189	Housing
133	HS85	Barnsley	Land at Hill Street/ Snape Hill Road, Darfield	30	30	Housing

134	HS86	Barnsley	Land at New Street, Wombwell		2	35	Housing
135	HS80	Barnsley	The Former Foulstone School		41	41	Housing
140	HS51	Barnsley	Site to the east of Broadwater Estate		0	279	Housing
141	HS44	Barnsley	Bolton House Farm, Goldthorpe		0	194	Housing
142	HS52	Barnsley	Land west of Thurnscoe Bridge Lane and south of Derry Grove, Thurnscoe		0	308	Housing
143	HS46	Barnsley	Land North of East Street, Goldthorpe		0	125	Housing
144	HS49	Barnsley	Land to the South of Beever Street Goldthorpe		125	179	Housing
145	HS48	Barnsley	land north of Barnburgh Lane, Goldthorpe		0	109	Housing
147	HS45	Barnsley	Land south of Barnburgh Lane		130	130	Housing
148	HS54	Barnsley	Land off Gooseacre Avenue, Thurnscoe		0	80	Housing
155	HS24	Barnsley	Land between Mount Vernon Road and Upper Sheffield Road		42	42	Housing
156	HS5	Barnsley	Land South of West Street, Worsbrough		70	70	Housing
158	HS65	Barnsley	Land North of Stead Lane, Hoyland		146	524	Housing
159	HS61	Barnsley	Land off Clough Fields Road, Hoyland		74	74	Housing
160	HS62	Barnsley	Land off Meadowfield Drive		0	74	Housing
161	HS58	Barnsley	Land at Broad Carr Road, Hoyland		0	131	Housing
163	S01465	Sheffield	Sewage works, Manchester Road, Deepcar		0	142	Housing
164	S00789	Sheffield	Land between Rookery Vale and Manchester Road, Deepcar		0	52	Housing
165	S00148	Sheffield	Former Occupational Training Centre, Westwood Road, High Green		18	18	Housing
166	S01203	Sheffield	Land off Norfolk Hill, Grenoside, Sheffield		38	38	Housing
168	S01179	Sheffield	Wiggan Farm, Towngate Road, Worrall, Sheffield		45	45	Housing
169	S01223	Sheffield	Former Silica Brick Works, Land off Platts Lane, Oughtibridge, Sheffield		98	98	Housing
170	S01184	Sheffield	Land off Platts Lane/ Oughtibridge Lane, Oughtibridge, Sheffield		34	34	Housing
171	S01594	Sheffield	Site surrounding Worrall Hall Farm, Kirk Edge Road, Worrall		25	25	Housing
173	S00764	Sheffield	Margetson Crescent, Parson Cross		30	30	Housing
174	S01453	Sheffield	Mansel Crescent/Mansel Road (Malshouses)		40	92	Housing
175	S01589	Sheffield	Chaucer School Site - Parson Cross Masterplan Area		31	31	Housing
176	S00674	Sheffield	Lytton Rd / Buchanan Rd / Wordsworth Ave (B2) Parson Cross Masterplan Area (Lytton A and B)		35	35	Housing
177	S02296	Sheffield	Land at Fox Hill Place, South Plot of Fox Hill Recreation Ground, S6 1GE (Site A, B, C)		25	25	Housing
178	S00016	Sheffield	Fox Hill Place Sheffield S6 1GE		70	156	Housing
179	S01458	Sheffield	Remington Youth Club Site, Remington Road		34	34	Housing
180	S01750	Sheffield	Knutton Rise		40	40	Housing
181	P00444	Sheffield	Chaucer Road / Mansell Avenue		36	36	Housing
182	P00307	Sheffield	Former 200-262 (evens) Deerlands Avenue		29	29	Housing
187	S00675	Sheffield	Buchanan Cresc/ Adlington Rd (C1 & C2) Parson Cross Masterplan Area (Adlington)		60	120	Housing
188	S00677	Sheffield	Falstaff Sites CDEF OPQR Buchanan Road		60	122	Housing
189	S01046	Sheffield	Former 354-384 (Evens) Deerlands Avenue [Part 1 (of 2) of Deerland Avenue 1] (Deerlands A)		48	48	Housing
190	S01459	Sheffield	St Paul's, Wordsworth Avenue		40	40	Housing
191	S01461	Sheffield	Steel City (Tennis Courts) Bellhouse Road, Firth Park		22	22	Housing
192	S02089	Sheffield	Wordsworth Avenue/Buchanan Road/Deerlands Avenue, Parson Cross		10	10	Housing
193	S00153	Sheffield	Parson Cross Hotel, Deerlands Avenue, Sheffield S5 8AA		20	20	Housing
194	P00306	Sheffield	Former 179-229 (odds) Deerlands Avenue		24	24	Housing
200	S01140	Sheffield	Land to the north of Fife Street, Wincobank		40	81	Housing
201	S01241	Sheffield	Land to the south of Fife Street, Wincobank		10	10	Housing
202	S00774	Sheffield	Pic Toys, Off Darnall Road		107	214	Housing
211	S00672	Sheffield	Musgrave Road Housing Clearance Site (E3 and E4), (Shirecliffe 2)		42	42	Housing
212	S00690	Sheffield	Earl Marshall		59	59	Housing
213	S00679	Sheffield	Falstaff Rd/ Adrian Cresc (Falstaff GHUKLMN)		103	103	Housing
214	S00063	Sheffield	Land Between Spital Hill Brunswick Road and Handley Street, Spital Hill, Sheffield S4 7LD		31	31	Housing

215	S00743	Sheffield	Pitsmoor Road/Chatham Street/Swinton Street	90	190	Housing
216	S00769	Sheffield	Fitzalan Works, Effingham Road, Attercliffe	33	33	Housing
217	S00772	Sheffield	Spartan Works, Attercliffe	22	22	Housing
218	S00775	Sheffield	Site adj. to Fitzalan Works, Attercliffe Road	15	15	Housing
219	S02092	Sheffield	Land at Somerset Road/ Richmond Street	24	24	Housing
220	S00766	Sheffield	Stanley Tools, Rutland Road, S3 9PT	45	45	Housing
221	S01136	Sheffield	Land between Pitsmoor Road and Woodside Lane, Woodside	100	100	Housing
222	S00685	Sheffield	Cannon Brewery, Rutland Road	13	13	Housing
223	S00692	Sheffield	Upwell Street	41	41	Housing
224	S00741	Sheffield	Victoria Station Road	27	27	Housing
225	S01694	Sheffield	Land At The Junction Of Abbeyfield Road And Holtwood Road Including 11 Holtwood Road Sheffield S4 7AY	15	15	Housing
226	S01754	Sheffield	Nursery Street	57	57	Housing
227	S01789	Sheffield	Site of Longley Old People's Home, Longley Hall Road	18	18	Housing
228	S02053	Sheffield	Rutland Road/ Rugby Road	13	13	Housing
229	S02054	Sheffield	Part Of Saxon Works Rutland Road Sheffield	22	22	Housing
230	S02060	Sheffield	NurseryLane/ Stanley Street	100	100	Housing
231	S02271	Sheffield	Titterton Close, Darnall	20	20	Housing
232	S02276	Sheffield	Mowbray Street/ Pitsmoor Road	33	33	Housing
233	S02281	Sheffield	Harvest Lane, S3 8EQ	45	45	Housing
234	S02282	Sheffield	Stanley Street, S3 8G	99	99	Housing
235	S02283	Sheffield	Wicker/ Wicker Lane, S3 8H (flats above shops on the Wicker)	81	81	Housing
236	S02284	Sheffield	Old Coroners Court Business Centre 14 - 38 Nursery Street Sheffield S3 8GG	30	30	Housing
237	S02596	Sheffield	Sheffield City Council Rutland Hostel 275 - 279 Rutland Road Sheffield S3 9PZ	24	24	Housing
238	P00312	Sheffield	Launce Rd/ Collinson Rd, Parson Cross	20	20	Housing
239	P00302	Sheffield	Collinson Road/Adrian Cres, Parson Cross	20	20	Housing
240	P00323	Sheffield	Former 16-42 Buchanan Road	18	18	Housing
241	P00029	Sheffield	Woodside clearance site	90	190	Housing
250	S00768	Sheffield	Attercliffe Canalside - Rippon Street Rec	100	213	Housing
251	S00776	Sheffield	Darnall Works (formerly Sanderson Kayzers), Wilfrid Road	100	169	Housing
252	S00826	Sheffield	Prince of Wales Road, Darnall	32	32	Housing
253	S00696	Sheffield	Staniforth Canalside	100	150	Housing
254	S00693	Sheffield	Ardmore Street, Shirland Lane	50	50	Housing
255	S00701	Sheffield	Manor Site 8	100	124	Housing
256	S00707	Sheffield	Mixed Development Site, Wulfric Road/ Windy House Road (Fairleigh) (Manor 5 & 9)	32	32	Housing
257	S00710	Sheffield	Harborough Road / Harborough Rise, Manor Park (Corker Bottom / Harborough Rise)	49	49	Housing
258	S00711	Sheffield	Manor Boot Houses (Manor Gateway)	100	226	Housing
259	S00700	Sheffield	Harborough Ave/ Viking Lea Drive Manor (part of Fairfax) (Manor 14)	95	95	Housing
260	S00702	Sheffield	Phase D, Stonecliffe Rd, Manor (The Circle, Upper) Harborough Avenue (Manor 10 and 11)	100	181	Housing
261	S00706	Sheffield	Manor Community Centre (Part of Fairfax)	39	39	Housing
262	S00715	Sheffield	Manor Park Avenue (Pennine Village)	92	92	Housing
263	S00069	Sheffield	Land, Site of Handsworth First School, St. Josephs Road and Fitzalan Road Sheffield	20	20	Housing
264	S00777	Sheffield	Pinfold Works, Staniforth Road	40	40	Housing
265	S00778	Sheffield	Westaways, Bacon Lane, Attercliffe	36	36	Housing
266	S01443	Sheffield	Infield Lane / Britannia Road	36	36	Housing
267	S01108	Sheffield	Land to the north of Ravencarr Road, Manor (Fretson) (Manor 13)	22	22	Housing
268	S00699	Sheffield	Fretson Road/ Motehall Road, Manor (the Circle Lower) (Manor 12)	100	122	Housing
269	S02415	Sheffield	Land at Infield Lane, Darnall, S9 5JH	37	37	Housing
270	S01112	Sheffield	Land off Corker Bottoms Lane, Wybourn	79	79	Housing
271	S00708	Sheffield	Pipworth School	42	42	Housing

272	S00697	Sheffield	Car Park, Kvaerner Site, Prince of Wales Road	46	46	Housing
273	S01475	Sheffield	Rear of White Rose PH, Handsworth Road	42	42	Housing
274	S02097	Sheffield	Portland Business Park, Richmond Park Road, Handsworth, Sheffield	43	43	Housing
275	S02273	Sheffield	Former Darnall Fire Station, Darnall Road, S9 5AF	28	28	Housing
276	S02401	Sheffield	Fulwood House, Old Fulwood road, S10 3TH	69	69	Housing
281	S01068	Sheffield	Land to the South of Beighton Road, Woodhouse	95	95	Housing
282	S00806	Sheffield	Woodhouse East (farmland area)	100	220	Housing
283	S00738	Sheffield	Owlthorpe D	71	71	Housing
284	S00736	Sheffield	Owlthorpe C	94	94	Housing
285	S00737	Sheffield	Owlthorpe E	92	92	Housing
286	S00785	Sheffield	Scrapyard and vacant land at Junction Road, Woodhouse (scrapyard)	60	60	Housing
287	S00159	Sheffield	Land Adjacent 53 Beighton Road, Woodhouse, Sheffield	14	14	Housing
288	S01060	Sheffield	Land to the west of Moorhorpe Rise, Owlthorpe	73	73	Housing
289	S01697	Sheffield	Curtilage Of Basforth House 471 Stradbroke Road Sheffield S13 7GE	21	21	Housing
290	S01795	Sheffield	Site of Tannery Lodge, 520 Stradbroke Road	28	28	Housing
300	S00799	Sheffield	Former Sheffield Hallam University Playing Fields at Hemsworth Road, Norton Woodseats	40	40	Housing
301	S00735	Sheffield	Former Hazlebarrow School, Hazlebarrow Crescent	30	30	Housing
302	S01097	Sheffield	Land off Matthews Lane, Norton	16	16	Housing
303	S01096	Sheffield	Land at Norton Lane, Oakes, Norton	21	21	Housing
304	S01898	Sheffield	Land Between 5 and 21 Holmhirst Road	10	10	Housing
305	S02441	Sheffield	Norton College Dyche Lane, Sheffield, South Yorkshire, S8 8BR	42	42	Housing
363	S00811	Sheffield	Beldon B, Norfolk Park (Norfolk Park site 11a)	32	32	Housing
364	S00740	Sheffield	Castle Markets	100	200	Housing
365	S00705	Sheffield	St Johns School, Manor Oaks Road	25	25	Housing
366	S00712	Sheffield	Skye Edge Avenue A (Skye Edge)	83	83	Housing
367	S00719	Sheffield	Kenninghall Drive, Norfolk Park (Norfolk Park Site 10)	95	95	Housing
368	S00718	Sheffield	Park Spring Drive, Norfolk Park site 5b	12	12	Housing
369	S00724	Sheffield	S R Gents factory, East Bank Road, Norfolk Park	17	17	Housing
370	S00783	Sheffield	Park Hill Flats, Duke Street, Sheffield (PHASES 2, 3 and 4)	300	628	Housing
371	S00717	Sheffield	Norfolk Park 4 and Bluestones (Land Between Park Grange Road And Beeches Drive Extending To Samuel Drive Park Grange Drive Sheffield S2)	92	92	Housing
372	S00746	Sheffield	West Bar Triangle	100	200	Housing
373	S01447	Sheffield	Claywood	80	80	Housing
374	S00758	Sheffield	Klausners Site, Sylvester Street / Mary Street	100	126	Housing
375	S02063	Sheffield	Norfolk Park 5c, Land next to Park Grange Road/ Queens Gardens (SHC)	24	24	Housing
376	S02093	Sheffield	Sheaf Square	65	65	Housing
377	S02098	Sheffield	Carver Lane/ Holly Street	45	45	Housing
378	S02095	Sheffield	Sheaf Street/ Pond Street	60	60	Housing
379	S02474	Sheffield	The Square, Land off Broad Street West	40	40	Housing
380	S00824	Sheffield	Gilders car showroom, 1 Ecclesall Road South, Sheffield	25	25	Housing
381	S00739	Sheffield	Cross Turner Street/Fornham Street	105	105	Housing
382	S00752	Sheffield	Arundel Gate / Esperanto Place / High Street, inc. Former Roxy Nightclub	100	225	Housing
383	S00725	Sheffield	Heeley Bank Centre	15	15	Housing
384	S00742	Sheffield	Court House, Waingate	18	18	Housing
385	S00756	Sheffield	Moore Street / Fitzwilliam Street	100	168	Housing
386	S00748	Sheffield	St Mary's Road / Suffolk Road / Fornham Street	100	135	Housing
387	S00747	Sheffield	Between Shoreham Street and Sidney Street	100	117	Housing
388	S00749	Sheffield	Car Park at Arundel Street/Charles Street	54	54	Housing
389	S00823	Sheffield	Somerfield, Banner Cross, Shopping Centre, Ecclesall Road	38	38	Housing
390	S00838	Sheffield	Site of Former 169 Upper Hanover Street and Land Rear of 194-198, Broomhall Street, Sheffield	18	18	Housing

391	S00843	Sheffield	Site of Flockton House/Flockton Court, Rockingham Street, Division Street And Westfield Terrace	100	144	Housing
392	S00164	Sheffield	121 Duke Street, S2 5QL	10	10	Housing
393	S01113	Sheffield	Land to the east of Maltravers Terrace, Wybourn	104	104	Housing
394	S00093	Sheffield	Charter Works, 20 Hodgson Street, Sheffield S3 7WQ	18	18	Housing
395	S00133	Sheffield	Land at Rockingham Street, Rockingham Lane and West Street, Sheffield	51	51	Housing
396	S00119	Sheffield	17 Broomgrove Road Sheffield S10 2LZ	15	15	Housing
397	S00044	Sheffield	149-155 Pinstone Street and 23 Furnival Gate	48	48	Housing
398	S00174	Sheffield	Land Adjoining 112 London Road Sheffield S2 4LR	15	15	Housing
399	S01415	Sheffield	Waitrose Supermarket, 123 Ecclesall Road, Sheffield, S11 8HY	25	25	Housing
400	S01403	Sheffield	Sheaf Quay, 1 North Quay Drive, Victoria Quay, Sheffield, S2 5SW	90	90	Housing
401	S01337	Sheffield	Bailey House, 5-11 Bailey Street, Sheffield, S1 4EH	17	17	Housing
402	S01773	Sheffield	Tritec, Milton Street	45	45	Housing
403	S02078	Sheffield	Eye Witness Works, Milton St	87	87	Housing
404	S02277	Sheffield	83 to 87 Fitzwilliam Street, S1 4JP	36	36	Housing
405	S02279	Sheffield	The Tramsheds, Leadmill Road, S1 4SJ	24	24	Housing
406	S02704	Sheffield	Land at 48 Suffolk Road, Sheffield, S2 4AF	48	48	Housing
407	S01266	Sheffield	Land at Banner Cross Hall, Carterknowle Road and Ecclesall Road, S11 9PD	59	59	Housing
408	S02466	Sheffield	Sextons Yard, Eccleshall Road South, Sheffield, S11 9QL	22	22	Housing
409	S02471	Sheffield	Springvale Gospel Hall, Carter Knowle Road, Sheffield, S7 2EB	22	22	Housing
410	S02598	Sheffield	MAST Old Sharrow Junior School South View Road Sheffield S7 1DB	13	13	Housing
411	S02599	Sheffield	Former East Hill Primary/ Secondary School East Bank Road Sheffield S2 3PX	51	51	Housing
412	S02744	Sheffield	51 - 65 High street, City Centre, Sheffield S1 2GD (former Primark store)	18	18	Housing
413	S02745	Sheffield	Car Park, Eyre Lane, Sheffield S1 4RB (on Furnival Square roundabout)	12	12	Housing
414	S00744	Sheffield	Headford Street/Egerton Street	30	30	Housing
415	S00753	Sheffield	Egerton Street / Hanover Way	100	175	Housing
416	S02750	Sheffield	Former Norfolk Park Primary Special School Park Grange Road Sheffield S2 3QF	24	24	Housing
418	S01360	Sheffield	Site of 2A and 2B Birley Moor Road and Birley Vale Avenue, Sheffield, S12 4WD	19	19	Housing
419	S01467	Sheffield	Site Of Properties At Scowderons Drive, Silkstone Road, Spa Brook Drive, Wickfield Close (Scowderons Phases 1b, 1c,2, 4,5, 6)	100	265	Housing
420	S01478	Sheffield	Weakland drive, Weakland Crescent	38	38	Housing
421	S01748	Sheffield	Former Ravencroft, Smelter Wood Road	22	22	Housing
422	S00014	Sheffield	Site of properties Birley Moor Ave, Newstead Ave, Newstead Grove, Newstead Pl, Newstead Rs, Newstead ay, Newstead Rd (remainder of Ne	100	165	Housing
423	S00794	Sheffield	TA Centre, Hurlfield Road, Manor Top	100	120	Housing
424	S01749	Sheffield	Former Foxwood, Ridgeway Road	39	39	Housing
425	S02275	Sheffield	Fire Station, Mansfield Road, S12 2AE	20	20	Housing
426	S02703	Sheffield	Land Off Jaunty Avenue, Base Green, S12 3DQ	66	66	Housing
427	56	Manchester	Adj to 275 great Ancoats Street	100	111	Housing
428	57	Manchester	Millhead AV/Manstead Wk, Miles Platting N'hood,M40	621	894	Housing
429	121	Manchester	Lower Medlock	357	357	Housing
430	177	Manchester	Peary Street	39	239	Housing
434	120	Manchester	West Gorton	107	535	Housing
435	175	Manchester	Collyhurst Road	43	243	Housing
436	176	Manchester	Lower Irk Valley, Carriage Sidings and N of Dantzig St	375	700	Housing
437	178	Manchester	Lower Irk Valley, land to the N and S of Roger street	700	1100	Housing
438	179	Manchester	Collyhurst Road	500	900	Housing
439	59	Manchester	St John's Qtr	450	2850	Housing
442	30	Stockport	Brinnington Development	265	265	Housing
444	HS10	Barnsley	Land North of Keresforth Road, Dodworth	135	175	Housing
446	S00767	Sheffield	River Don District, Weedon Street	300	800	Housing
447	S02464	Sheffield	Meadowhall and the surrounding lands- M1 Distribution centre and The Source, Vulcan Road, SE9 1EW	43	43	Housing

453	S01451	Sheffield	Algar Place/ Algar Road (Arbourthorne Fields Phase 3)	100	142	Housing
454	S00733	Sheffield	Gaunt Road (previously numbered 95 - 381)	18	18	Housing
455	S00721	Sheffield	Land Between East Bank Way East Bank Road And Daresbury Drive, Sheffield (Daresbury - Sheffield Housing Company Phase 2)	43	43	Housing
456	S01450	Sheffield	Berners Road/Berners Place (Arbourthorne Fields Phase 2 - Berners Road)	73	73	Housing
457	S01347	Sheffield	Site of Park & Arbourthorne Labour Club, Eastern Avenue/City Road, Sheffield, S2 2GG	10	10	Housing
458	S01463	Sheffield	Hurlfield Service Reservoir, Hurlfield Road	12	12	Housing
459	S02529	Sheffield	Former Cradock School Site, Sheffield S2 2JZ	29	29	Housing
461	S00671	Sheffield	Site A Stocksbridge Steelworks, off Manchester Road, Stocksbridge	235	235	Housing
462	S00788	Sheffield	Hawthorn Avenue/ Coppice Close, Stocksbridge	52	52	Housing
463	HS81	Barnsley	Land rear of Kings Oak Primary School, Wombwell	60	60	Housing
464	HS84	Barnsley	Land east of Lundhill Road, Wombwell	150	150	Housing
492	S00831	Sheffield	Land off Ash Street/Langsett Road	25	25	Housing
493	S00050	Sheffield	Former British Glass Laboratories Northumberland Road	18	18	Housing
494	S01039	Sheffield	Site of Hillfoot Mitsubishi, 101 Scotland Street, Sheffield S3 7BX	12	12	Housing
495	S00046	Sheffield	Land Adjacent to and Rear of 85 Scotland Street, Sheffield	81	81	Housing
496	S00755	Sheffield	St Vincent's Church, Solly Street	100	224	Housing
497	S00754	Sheffield	Rockingham Street / Bailey Lane / Boden Lane	100	144	Housing
498	S00065	Sheffield	Land at Acorn Street, Green Lane And Dunfields	56	56	Housing
499	S00757	Sheffield	Upper Allen Street, Craven Street, Morpeth Street & Well Meadow Street	100	111	Housing
500	S00759	Sheffield	St. Phillip's Social Club, Radford Street / Daisy Walk	106	106	Housing
501	S00101	Sheffield	Wharcliffe Works and 86-88 Green Lane	18	18	Housing
502	S00102	Sheffield	Car Park Next to Steel City Plaza, Townhead Street, Sheffield S1 2EB	21	21	Housing
503	S00053	Sheffield	Land at Junction of West Bar/Lambert Street and 117-119 West Bar Sheffield S3 8PT	45	45	Housing
504	S00041	Sheffield	Land Opposite 134 to 180 St Georges Close Sheffield	33	33	Housing
505	S00852	Sheffield	Site At 31 Acorn Street/Dunfields/Green Lane (Site 4)SheffieldS3 8SQ	20	20	Housing
506	S01225	Sheffield	Lydgate Service Reservoir, off Ryegate Crescent, Crookes	21	21	Housing
507	S01345	Sheffield	Toledo Works, 79-81 Hollis Croft, Sheffield, S1 4BG	33	33	Housing
508	S01338	Sheffield	Site of 55 Russell Street and Bowling Green Street, Sheffield, S3 8RW	48	48	Housing
509	S01390	Sheffield	Walkley House, Burnaby Crescent, Sheffield, S6 2TS	10	10	Housing
510	S01226	Sheffield	Hadfield Service Reservoir, off Glebe Road/ Blakeney Road, Crookes	45	45	Housing
511	S01753	Sheffield	Hoyle Street Development Site	43	43	Housing
512	S01751	Sheffield	Whitehouse Lane, 158 Primrose View	12	12	Housing
513	S02052	Sheffield	Brass Founders Sheffield Ltd Princess Works Scotland Street Sheffield S3 7BX	48	48	Housing
514	S02267	Sheffield	Former Bole hill residential Home, Bole hill View, S10 1QL	20	20	Housing
515	S02285	Sheffield	Former Footprint Tools, Hollis Croft	100	130	Housing
516	S02297	Sheffield	Don Cutlery Works, Doncaster Street	15	15	Housing
517	S02298	Sheffield	7 to 15 St James Row	21	21	Housing
518	S02458	Sheffield	Northumberland Road Car Park	22	22	Housing
519	S02508	Sheffield	Sport Sheffield (Goodwin Sports Centre), Northumberland Road, S10 2TY	76	76	Housing
524	28.1.2	Manchester	Roundthorn Medipark Extension	0	86000	Employment
525	87	Stockport	Factory off Pepper Road	4500	9000	Employment
527	E58	Barnsley	Land off Ferrymoor Way	0	5100	Employment
528	E59	Barnsley	Land west of Springvale Road	1800	3600	Employment
529	E56	Barnsley	Bromcliffe Business Park	0	2100	Employment
530	E52	Barnsley	Claycliffe Business Park	0	4500	Employment
531	E53	Barnsley	Zenith Business Park	0	1200	Employment
534	E57	Barnsley	Oaks Business Park	1350	2700	Employment
535	E522	Barnsley	Park Springs, Houghton	0	10200	Employment
536	E523	Barnsley	Land South of Park Springs	0	24900	Employment

537	ES10	Barnsley	Land South of Dearne Valley Parkway	0	218700	Employment
538	ES11	Barnsley	Fields End Business Park	0	6000	Employment
539	ES12	Barnsley	Thurnscoe Business Park	0	18000	Employment
540	ES15	Barnsley	Shortwood Extension	35400	35400	Employment
541	ES16	Barnsley	Shortwood Business Park	0	11400	Employment
542	ES17	Barnsley	Land South of Dearne Valley Parkway	0	84600	Employment
543	ES18	Barnsley	Ashroyd	0	25500	Employment
548	0	Sheffield	Sheffield Wednesday Football Club Training Ground, Middlewood Road	0	3900	Employment
550	0	Sheffield	Jubilee House And Adjoining Land, Clay Wheels Lane	0	4300	Employment
551	0	Sheffield	Central Works, Herries Road	0	2600	Employment
552	0	Sheffield	Site Of Riverdale Works (Former Harold Moore Factory), Rawson Spring Road	0	2510	Employment
559	0	Sheffield	Sheffield United FC Academy, Shirecliffe Road	0	2000	Employment
560	0	Sheffield	Salmon Pastures, Warren Street	0	1000	Employment
561	0	Sheffield	Clough Bank Works, 1 Downgate Drive	0	1080	Employment
577	0	Sheffield	West Bar Square	0	56900	Employment
578	0	Sheffield	Sheffield United Football Club, Highfield - The Kop Stand, Shoreham Street	0	11900	Employment
579	0	Sheffield	121 Eyre Street	0	6700	Employment
580	0	Sheffield	Sidney Street / Matilda Street / Arundel Street / Sylvester Street	0	1860	Employment
581	0	Sheffield	Sheaf Quay, 1 North Quay Drive, Victoria Quays	0	1840	Employment
582	0	Sheffield	Castle House, Angel Street	0	1770	Employment
583	0	Sheffield	Site Of Sheffield MDC Car Park At Rear Of Bristol Hotel, Blonk Street	0	11800	Employment
584	0	Sheffield	The Old Dairy, Broadfield Road	0	2045	Employment
585	0	Sheffield	Former Office World Site, Furnival Square, Eyre Street / Furnival Street	0	14200	Employment
610	28.1	Manchester	Airport City South	0	40000	Employment
616	28.4.2	Stockport	Bredbury Park Extension	0	90000	Employment
619	ES1	Barnsley	Birthwaite Business Park	0	10500	Employment
622	ES13	Barnsley	Hoyland - Masterplanning site	0	148200	Employment
623	ES21	Barnsley	Wentworth Industrial Park, Tankersley	0	12900	Employment
627	0	Sheffield	Former Smithywood Colliery, Cowley Hill / Nether Lane	0	53000	Employment
628	ES20	Barnsley	Everill Gate Lane	5400	10800	Employment
629	0	Sheffield	The Nichols Building, Shalesmoor	0	2000	Employment
630	0	Sheffield	Clarkson Osborn International Ltd, 100 Penistone Road	0	10250	Employment
631	0	Sheffield	Pennine Centre, Tenter Street / Hawley Street / Silver Street Head / Lee Croft / Sims Street	0	9200	Employment
632	0	Sheffield	Site Of Former Presto International UK Ltd, Penistone Road	0	11100	Employment
635	28.8.9	Oldham	OA9 Cowlshaw	124	465	Housing
636	28.8.11	Oldham	OA11 Beal Valley	0	482	Housing
637	28.8.8	Oldham	OA8 Broadbent Moss	0	1198	Housing
638	28.8.12	Oldham	OA12 Robert Fletchers	0	170	Housing
639	51	Trafford	Pomona Island Strategic Location	0	358	Housing
642	28.2.1	Trafford	New Carrington - GMSF allocation	0	4775	Housing
643	52	Trafford	Carrington Strategic Location	0	235	Housing
647	28.1.3	Trafford	Timpereley Wedge - GMSF allocation	0	2400	Housing
649	28.8.10	Oldham	Hanging Chadder	0	260	Housing
650	28.3.4	Oldham and Rochdale	Stakehill	0	1700	Housing
651	28.3.5	Oldham and Rochdale	Kingsway South	0	700	Housing
652	28.2.2	Salford	western Cadishead and irlam	0	2250	Housing
654	54	Trafford	Wharfside Strategic Location	0	546	Housing
659	28.1.3	Trafford	Timpereley Wedge, Davenport Green	0	60000	Employment
660	28.2.1	Trafford	New Carrington	0	410000	Employment

661	28.2.3	Salford	Port Salford Extension	0	320000	Employment
662	28.3.4	Oldham and Rochdale	Stakehill	0	250000	Employment
663	28.3.5	Oldham and Rochdale	Kingsway South	0	310000	Employment
664	28.8.8	Oldham	OA8 Broadbent Moss	21720	21720	Employment
681	ES14	Barnsley	Rockingham	0	25800	Employment
682	ES19	Barnsley	Land North of Sheffield Road	0	9900	Employment
683	HS14	Barnsley	Site at Garden House Farm, Monk Bretton	70	70	Housing
686	HS22	Barnsley	Land at St Michael's Avenue, Carlton	0	38	Housing
687	HS23	Barnsley	Land off Highstone Lane, Worsbrough Common	18	18	Housing
688	HS26	Barnsley	Zenith Extension	0	143	Housing
689	HS28	Barnsley	Land South West Of Priory Road, Lundwood	18	36	Housing
690	HS29	Barnsley	Land off Mount Vernon Road, Barnsley	74	74	Housing
691	HS30	Barnsley	Land off Leighton Close	18	18	Housing
694	HS42	Barnsley	Land South of Lowfield Road, Bolton Upon Dearne	86	86	Housing
695	HS53	Barnsley	Site South of King Street, Thurnscoe	0	25	Housing
696	HS57	Barnsley	Land at Tankersley Lane, Hoyland Common	46	97	Housing
697	HS59	Barnsley	Land South of Hay Green Lane, Birdwell	118	118	Housing
698	HS6	Barnsley	Site south of Coniston Avenue, Darton	40	40	Housing
699	HS60	Barnsley	Greenside Lane, Hoyland	22	22	Housing
700	HS63	Barnsley	Land off Welland Crescent, Elsecar	0	29	Housing
701	HS67	Barnsley	Land at Sheffield Road, Birdwell	17	17	Housing
702	HS68	Barnsley	Land East of Sheffield Road, Hoyland Common	220	237	Housing
703	HS69	Barnsley	Land North of Wood Walk, Hoyland	112	112	Housing
705	HS71	Barnsley	Land at Talbot Road, Penistone	40	40	Housing
706	HS72	Barnsley	Land East of Saunderson Avenue, Penistone	28	28	Housing
707	HS76	Barnsley	Land at end of Melton Way, Royston	0	58	Housing
708	HS77	Barnsley	Land North of Pitt Street, Wombwell	0	109	Housing
710	HS87	Barnsley	Land East of Wortley Street, Wombwell	40	40	Housing
712	HS89	Barnsley	Land off Roughbirkworth Lane, Oxspring	22	22	Housing
713	HS9	Barnsley	Site East of Smithy Wood Lane, Gilroyd	0	144	Housing
714	HS90	Barnsley	Land off High Street, Great Houghton	27	67	Housing
715	HS91	Barnsley	Land off Cote Lane, Thurgoland	0	22	Housing
716	HS92	Barnsley	Everill Gate Farm, Broomhill	0	26	Housing
717	HS93	Barnsley	Site north of Halifax Road, Thurgoland	25	25	Housing
719	HS95	Barnsley	Land at Hall Farm, Brierley	29	29	Housing
722	MU2	Barnsley	Land between Fish Dam Lane & Carlton Road, Carlton	94	294	Housing
723	MU3	Barnsley	Land between Shaw Lane & West Green Link Road, Royston	80	1683	Housing
724	MU4	Barnsley	Land off Broadway, Barnsley	70	150	Housing
726	Town Centre Development	Barnsley	Southern Fringe Development Site, Barnsley Town Centre	0	88	Housing
727	Town Centre Development	Barnsley	Courthouse Campus, Barnsley Town Centre	98	138	Housing
731	Policy H2 (G3)	High Peak (Glossopdale)	Roughfields, Hadfield	51	102	Housing
732	Policy H2 (G12)	High Peak (Glossopdale)	Bute Street, Glossop	0	30	Housing
733	Policy H2 (G20)	High Peak (Glossopdale)	Dinting Lane, Glossop	0	50	Housing
734	Policy H2 (G23)	High Peak (Glossopdale)	Former Railway Museum, Glossop	0	89	Housing
735	Policy H2 (G25)	High Peak (Glossopdale)	Land off Melandra Castle Road	15	35	Housing
736	Policy DS4 & Policy H	High Peak (Glossopdale)	Adderley Place	65	130	Housing
737	Policy E2 (Land off V	High Peak (Glossopdale)	Land off Wren Nest Road, Glossop	0	25000	employment
746	Policy DS18 & Policy	High Peak (Buxton)	West of Tongue Lane, Buxton	0	139	Housing
747	Policy DS19 & Policy	High Peak (Buxton)	Land off Dukes Drive, Buxton	169	338	Housing

749	Policy DS22 & Policy	High Peak (Buxton)	Station Road, Buxton		30	30	Housing
750	Policy E2 (Staden La	High Peak (Buxton)	Staden Lane, Buxton		0	13600	employment
753	Policy E2 (Tongue La	High Peak (Buxton)	Tongue Lane, Buxton		0	20000	employment
764	Policy DSC10 Policy	High Peak (Central Area)	Britannia Mill, Buxworth		0	50	Housing
765	Policy DS8 & Policy H	High Peak (Central Area)	Derby Road, New Mills		54	107	Housing
766	Policy DS9 & Policy H	High Peak (Central Area)	Ollersset Lane, New Mills		120	239	Housing
767	Policy H2 (C7)	High Peak (Central Area)	Woodside Street, New Mills		0	25	Housing
768	Policy H2 (C16)	High Peak (Central Area)	Furness Vale A6		0	39	Housing
769	Policy DSC12 & Polid	High Peak (Central Area)	Furness Vale Business Park		0	32500	Employment
770	Policy DS15 & Policy	High Peak (Central Area)	Birch Vale Industrial Estate		0	9000	Employment
777	Policy DS14 (C20)	High Peak (Central Area)	Newtown Industrial Legacy site		0	11000	Employment
778	Policy DS11	High Peak (Central Area)	Bingswood, Whaley Bridge		0	43000	Employment
779	Policy DS13	High Peak (Central Area)	Torr Vale Mill, New Mills		0	4000	Employment
888	0	Stockport	Cheadle Royal Business Park		5500	11000	Employment
889	0	Stockport	Land off Ashurst Drive, Cheadle		3345	3345	Employment
890	0	Stockport	Land off Duke Avenue, Cheadle Hulme		4482	4482	Employment
891	0	Stockport	Ajax Works, Whitehill Road, Reddish		1246	1246	Employment
893	H-HYDNEW-003	Tameside	Former Newton Printworks (ABC Wax), Clarendon Road, Hyde, SK14 2LJ		0	155	Housing
914	H/E14	High Peak	Street Crane		1958	1958	Employment
926	0	Tameside	H-DROEST-055 Seamark		77	225	Housing
927	0	Tameside	H-STANTH-032 Harrop Street and Shepley Street, UDP Allocation E2(9)		0	277	Housing
928	0	Tameside	H-STPETE-164 Ashton town centre		0	600	Housing
929	0	Tameside	E-DENWST-003 - Former Gasworks		3164	3955	Employment
930	0	Tameside	E-MOSSLE-001 - Metal Brite Ltd		0	1578	Employment
931	0	Tameside	E-STANTH-002 - Site of Former Ray Mill		1839	2299	Employment
932	0	Tameside	E-STMICH-001 - Unit 2		0	1799	Employment
934	0	Tameside	E-STPETE-008 - Goldgem Site		0	1900	Employment
936	S/H7	Stockport	Compstall Mills, Andrew Street, Compstall		61	121	Housing
937	S/H10	Stockport	Greenhale House site, Piccadilly, Town Centre		78	155	Housing
939	S/H19	Stockport	Piccadilly / Fletcher Street Car Park, Town Centre		63	125	Housing
941	S/H22	Stockport	Broadstone Mill, Broadstone Road, Reddish		50	100	Housing
942	S/H5	Stockport	Land at Midland Rd / Geneva Rd, Bramhall		82	163	Housing
943	S/E14	Stockport	Melford Road Employment Area, Melford Road, Hazel Grove		4750	9500	Employment
944	S/E12	Stockport	Woodford, Former BAE site		4181	8361	Employment
945	S/E12	Stockport	Woodford, Former BAE site		475	950	Housing
946	S/E10	Stockport	Stockport Town Centre, Town Centre Area		60000	120000	Employment
948	S/E19	Stockport	Compstall Mills, Andrew Street		1229	2458	Employment
949	S/E7	Stockport	Kings Reach, Yew Street, Yew Street, Stockport		6278	12555	Employment
951	S/R39	Stockport	DC/050476, Blackstone, Blackstone Field, Lisburne Lane, Offerton Estate, Stockport, SK2 5na		245	490	Employment
952	S/R40	Stockport	DC/051676, Water Street, Land At Water Street, Stockport, Sk1 2bt		2787	5574	Employment
954		Stockport	Unit 6, Peel Centre (DC/052216), UNIT 6 (Toys R Us) PEEL CENTRE, GREAT PORTWOOD STREET, STOCKPORT, SK1 2HH		2697	5393	Employment
955	0	Manchester	EW9b Styal Road/ Irvin Drive		0	15300	Employment
956	M/E8	Manchester	1.16ha Office Allocation with vacant plots remaining undeveloped at Simons Way/Shadowmoss Road		11600	11600	Employment

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