

**A57 Link Roads
TR010034
9.70 Comments on Deadline 6
Responses**

Rule 8(1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

March 2022

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads Development Consent Order 202[x]

9.70 Comments on Deadline 6 responses

Rule Number:	Rule 8(1)(k)
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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 6 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:
- REP6-024 CPRE Peak District and South Yorkshire Branch response to the Examining Authority's Second Written Questions
 - REP6-026 Derbyshire county Council response to the Examining Authority's Second Written Questions
 - REP6-027 High Peak Borough Council response to the Examining Authority's Second Written Questions
 - REP6-030 Sharefirst My Journey to School response to the Examining Authority's Second Written Questions
 - REP6-033 CPRE Peak District and South Yorkshire Branch response to the Applicant's ISH2 post-hearing submission at Deadline 5 and response to the Examining Authority's Second Written Questions
 - REP6-034 Daniel Wimberly comments on Deadline 5 Submissions
 - REP6-035 Jeff Brown comments on the Proposed Development
 - REP6-036 Keith and Jane Bassham comments in support of submissions from Sharefirst My Journey to School and on the Proposed Development
 - REP6-038 Tim Nicholson on behalf of Peak District National Parks Authority response to the Examining Authority's Second Written Questions
- 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. REP6-024 CPRE Peak District and South Yorkshire Branch response to the Examining Authority's Second Written Questions

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
9.70.1	3.3 / 3.4	<p>3.3: There are aspirations, both at local and national level, to transfer journeys to more sustainable transport modes.</p> <p>a) Is this reflected within the model? b) If so, what assumptions and allowances have been made to reflect this? c) If not, should it be?</p> <p>3.4: There are concerns, expressed by CPRE Peak District and South Yorkshire Branch in [REP5-029 paragraphs 160 and 170] and elsewhere, that public transport and active travel modes have been under-represented in the model.</p> <p>a) Please provide comments on the issues raised. b) If these modes have been under-represented, what effect would this have on the case for the scheme? Do the local highway authorities have any comments in regard to this issue?</p>	<p>Public transport On public transport we are seeking a Statement of Common Ground but have not yet received a final clarificatory response on what is in the model. We think we know and just need it confirmed. Since this has not yet been forthcoming, we have today sent the statement below to NH for comment and possible agreement.</p> <p>"The model contains public transport trips by people who have a car available but not by other users. In addition, only trips with either an origin or destination in the Area of Detailed Modelling are actively modelled. All other public transport trips are fixed."</p> <p>We think we have already agreed that walking and cycling are not included in the model. We are still working on the public transport data NH have sent us. They have explained why they have not supplied the full data as requested but this is not a technical reason, but their own decision. We will submit our conclusions to you and the Examination in the next week – it is not ready for Deadline 6. We have been in email contact with the Inspectorate separately to update the Panel about this (REP5-038).</p>	<p>Please refer to National Highways' response to the Examining Authority's Second Written Question 3.3 and 3.4 (REP6-017).</p>
9.70.2	3.13 a)	<p>Improving road access to the National Park may encourage people to access the National Park by private motor car. During site inspections, it was observed that much of the parking along the A57 Snake Pass took the form of informal roadside parking, particularly around locations where Public Rights of Way (PRoW) cross or join the road.</p> <p>a) What effects would increased parking demand have on: - <ul style="list-style-type: none"> • Highway safety, and • Visual amenity? </p> <p>b) Should formal provision be made to manage these effects? c) If not, why not? d) If so, how could such provision be secured?</p>	<p>The informal parking arrangements at the top of the Snake Pass have compromised highway safety and visual amenity. Cars park on both sides of the carriageway narrowing the passage for vehicles using the Snake Pass to the extent that on occasion it is difficult for farmers, delivery vehicles and ambulances to get through. Derbyshire County Council has attempted to control this with double yellow lines, which themselves impair the rural character of the road. However the double yellow lines have been largely ineffective in controlling parking, partly due to infrequent enforcement due to lack of resources. On the eastbound carriageway drivers arrive at speed at the top of the Pass and for westbound drivers there is a blind summit. In poor weather conditions all these effects combine to create significant road safety hazards.</p>	<p>Please refer to National Highways' response to Examining Authority's Second Written Questions 4.7 (REP6-017).</p>

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		<p>e) Could increased demand for travel for visitors be addressed in other ways?</p> <p>f) If so, how would this be delivered?</p>	<p>Parked and moving vehicles significantly impact on open access land on both Kinder and Bleaklow. This harms visual amenity and destroys tranquillity. All of these impacts are contrary to achieving statutory National Park purposes to conserve and enhance the natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of its special qualities by the public (our emphasis). The enhancement of the Park is a legal requirement, not an optional extra when considering its future management. This is emphasised by the Government's response to the Glover Landscape Review (Jan 2022) which signals the fundamental importance of National Park statutory purposes and that both the first statutory purpose and the section 62 duty for public bodies require strengthening.</p>	
9.70.3	5.8	<p>CPRE Peak District and South Yorkshire Branch [REP3-033] suggested a site inspection of private land in the pastures south of Mottram Old Hall to understand the impacts of the Proposed Development, including the proposed eastern portal and carriageway. Future views are noted from a bridleway and by drivers. The Applicant is quoted as saying that there would be no views from sensitive receptors.</p> <p>The ExA is requesting more information on the matters raised by CPRE Peak District and South Yorkshire Branch before deciding if a site inspection should be carried out.</p> <p>a) Please could CPRE Peak District and South Yorkshire Branch clarify the bridleway locations with potential views of the proposed eastern portal and dual carriageway that it is concerned about?</p> <p>Please could the Applicant comment on the matters raised by CPRE Peak District and South Yorkshire? How visible would the proposed eastern portal and dual carriageway be from bridleways, other public rights of way, or other sensitive receptors and how have these been considered in the assessment? What consideration has been given to views by users of the proposed carriageway?</p>	<p>a) Views of the proposed eastern portal and adjacent dual carriageway would be available to users of (i) the proposed bridleway along the top of the cutting adjacent to the westbound carriageway of new dual carriageway section as it ascends Mottram Pasture; and (ii) Coach Road.</p> <p>(i) A new bridleway is proposed along the top of the cutting between the new junction at Mottram Moor and Old Hall Lane. The shallow slope of the cutting would be vegetated with grass. Adjacent to the bridleway there would be a new hedge extending from the eastern portal of the underpass (chain 1160), almost to chain 1500. At the western end of the bridleway between the underpass and extending to just short of chain 1200, i.e. for a much shorter distance than the hedge, there would be an environmental barrier 2-2.6m high. Thus, east of the environmental barrier the dual carriageway and the eastern portal would be available to view by users of the bridleway, at least until and if the hedge grows (see screenshot below from 2.6 Scheme Layouts, sheet 3 of 10). Section 07 in 2.7 Engineering drawings and sections presents a similar impression of visibility from the new bridleway. The eastern portal would</p>	<p>a(i) Users of the proposed bridleway will get views of the eastern portal, however the assessment only considers the impact on views for existing receptors (which allows for magnitude of change). Views for users of the proposed bridleway have not been considered as there is no existing baseline to determine magnitude of change from.</p> <p>a(ii) The two down arrows are pointing to boreholes from recent ground investigations. These are not markers to indicate the position of the dual carriageway. Please refer to the assessment of views from Coach Road in Appendix 7.1 of the ES (REP2-042) and the Applicant's response to ExA WQ2 5.8b (REP6-017).</p>

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			<p>also be visible to those looking over the edge of the public open space above the underpass.</p>  <p>(ii) Currently views of the western half of Mottram pasture from Coach Road (LON 108) are concealed by mature trees. At the northern end of Coach Road the topography and the proposed planting would conceal the dual carriageway and the eastern portal as shown by the photomontage from VP6.</p> <p>On Coach Road at its southern end V-R-42, Nettle Hall Farm and adjacent properties, would be able to see the eastern tunnel portal (Appendix 7.1 Table 1-3, page 63). At opening year, the cutting slopes and eastern tunnel portal and loss of defining woodland features will be perceptible features in the view.</p> <p>This has led to a magnitude of effect on V-R-42 in year 1 winter of 'moderate adverse' and in year 15 summer of 'minor adverse'. The significance of the effect is 'moderate adverse' in year 1 winter and 'negligible' and 'slight' in year 15 winter and summer respectively. The reduction in effect depends on retention of existing trees, successful maturation of trees planted, and a hedge along the top of the embankment. As NH is assessing views from private properties we cannot confirm if this assessment is correct. There are no viewpoints available to us. National Highways states that VP7 provides a partial view from Nettle Hall (Appendix 7.1 Table 1-3, page 63). This is incorrect. VP7 is looking southeast across Mottram Moor towards the location of the proposed Mottram Moor junction. Nettle Hall is 300m to</p>	

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			<p>the northeast of this location, downhill from it and obscured by vegetation and housing. It is not captured, even partially, by VP7.</p> <p>For impacts on users of Coach Road, V-P-05-1, NH has used VP6. Despite the topography and the proposed mitigation planting that appears to screen views from VP6, the views score the same magnitude and significance of effects as those from the private properties at Nettle Hall. However, the impact of the scheme further south on Coach Road between Nettle Hall and VP6, is not presented. Given the views from Nettle Hall it is likely that the scheme's eastern portal would be visible to walkers ascending Coach Road from Nettle Hall. This is particularly likely as at chain 1500 the cutting adjacent to the eastbound carriageway gives way to an embankment as the road approaches Mottram Moor.</p>  <p>The photograph above was taken from GR SJ9970096225 on Coach Road. The two down pointing black arrows show the position of two blue marker posts for the dual carriageway. Clearly the majority of the vegetation would be removed from this view creating visibility through to Spout Green, Old Hall Lane and the eastern portal.</p> <p>As the whole of Mottram Pasture is private land, we believe that understanding the visibility of the eastern portal and dual carriageway from these two PRow requires a site visit.</p>	

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9.70.4	12.8	<p>In your submission at Deadline 5 [REP5-028], reference is made to the current number of mountain hare numbers located in the Peak District being in the low thousands and a report from Spring 2004 indicating that traffic on the A57 probably claims 20% of adult hares living adjacent to the road.</p> <p>Please can you explain the basis for the information presented about current numbers and whether there is any more recent data or evidence in respect of the proportion of mountain hares killed by traffic on the A57 and / or data or evidence relating to other relevant roads.</p>	<p>The reference we cited in REP5-028 is reproduced below. The late Derek Yalden, then president of the Mammal Society, estimated the mountain hare population based on the statistical model of distance sampling. This required dividing the total Dark Peak habitat into squares of a kilometre, and walking and counting hares seen during walks within 100 of the square kilometres. The 100 square kilometres were chosen at random and led to an estimated hare population of 10,000 mountain hares in the Dark Peak.</p> <p>More recently Dr Carlos Bedson has completed a PhD on mountain hares at Manchester Metropolitan University. He has most generously prepared the accompanying paper specifically to address this question. It is presented as a separate submission, Appendix A.</p>	<p>The Applicant maintains that it unlikely that the modelled increase in vehicle passes would lead to a significant increase in roadkill of mountain hares. Please refer to the Applicant's response to ExA WQ2 12.8 (REP6-017).</p>

3. REP6-026 Derbyshire County Council response to the Examining Authority's Second Written Questions

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
9.70.5	1.2	<p>Derbyshire County Council [REP4-010] raised concerns about the need to secure pre-commencement archaeological investigations and mitigation works, the need for a Written Scheme of Investigation, and for Derbyshire County Council to be consulted accordingly.</p> <p>The Applicant [REP4-006 page 9] has suggested the addition of Requirement 10(8). The ExA understands that the suggestion is that this would provide the necessary mitigation when taken together with Requirement 10(1) and the addition of a definition of "preliminary works" to Requirement 1.</p> <p>a) Does Derbyshire County Council have any comments on the Applicant's updates to the dDCO [REP5-006]?</p> <p>b) Does Derbyshire County Council have any remaining concerns regarding the mitigation of pre-commencement activities?</p>	<p>a) Derbyshire County Council notes the applicant's response to this issue in REP4-006 page 9 which notes that:</p> <p>The Applicant acknowledges that mitigation is not currently secured. In terms of archaeology there would be scope to bring in the archaeological works and any ground works into Requirement 10 which states: 10 —(1) No part of the authorised development is to commence until for that part a written scheme for the investigation of areas of archaeological interest, reflecting the relevant mitigation measures set out in the REAC, have been set out in a Written Scheme of Investigation (WSI) that has been submitted to and approved in writing by the Greater Manchester Archaeological Advisory Service (GMAAS), Derbyshire Council's county archaeologist and the Secretary of State, following consultation with the relevant planning authority on matters related to its function. Reference to "Part" would include any archaeological works or ground works. Derbyshire County Council is satisfied that this matter could be secured within the scope of Requirement 10-1. The Council would suggest that this could be facilitated by amended wording to reference to 'part' and clarification that this would include any archaeological works or ground works, including pre commencement works.</p> <p>b) Except for the above, Derbyshire County Council has no further concerns.</p>	<p>The interpretation provisions in Schedule 2 (Requirements) within the dDCO now includes a definition of preliminary works and sub paragraph (8) of Requirement 10 states that "for the purposes of this paragraph 10 reference to part shall include the preliminary works where the preliminary works comprise intrusive ground works". This would capture archaeological works. Other ground works should only be captured if they are intrusive and so likely to affect archaeology.</p>
9.70.6	8.5	<p>The Applicant [REP2-021 Q8.1d and REP4-008 Item 6g] refers to the case of R (Transport Action Network Limited) v Secretary of State for Transport and Highways England Company Limited (2021) EWHC 2095 (Admin). The Applicant suggests that the carbon emissions from the Proposed Development should not be considered significant if the assessment is to be consistent with that judgement.</p> <p>Please could the local authorities and Interested Parties comment?</p>	<p>Derbyshire County Council is satisfied with the Applicant's response, but would like to seek further evidence to back-up the final statement made under Item 6g that "increases in GHG emissions are anticipated to be substantially outweighed by the benefits of electrifying the national fleet which is the focus of government policy in this area".</p>	<p>Please refer to National Highways' response to ExAWQ1 8.13 (REP2-021) and to National Highways' response to Issue Specific Hearing 2 Item 6 c) and d) Cumulative Carbon Assessment (REP5-026).</p> <p>With regard to the statement "increases in GHG emissions are anticipated to be substantially outweighed by the benefits of electrifying the national fleet which is the focus of government policy in this area", the assessment of operational road traffic related carbon emissions presented in the ES Chapter 14: Climate (REP1-019) is based on National Highways speed band emission rates which use the Defra Emissions Factors Toolkit (EFT v10.1). These emission rates were published</p>

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				<p>in August 2020 and were the latest available at the time the emissions modelling was undertaken and included assumptions about future fleet mixes assumed at that time. EFT v10.1 included emission factors up to and including 2030. As emission rates were only for the period to 2030 an assumption of no change in emission factors beyond 2030 was made.</p> <p>Defra published an updated Emissions Factors Toolkit in November 2021 (v11), which extended emission factors for carbon to 2050, which accounts for commitments to move to electrifying the national fleet prior that were in place prior to the announcement by the Government to end the sale of new petrol and diesel petrol and diesel vehicles by 2030, and that all new cars and vans will be required to be fully zero emission at the tailpipe by 2035 and the publication of the Transport Decarbonisation Plan (TDP) in July 2021. Carbon emission changes calculated using Defra Emissions Factors Toolkit (EFT v11) as presented in REP5-026 show that use of EFT v11, which accounts for greater electrification of the fleet reduced carbon emissions from those presented in the ES.</p>
9.70.7	11.9	Please provide an update regarding discussions seeking to secure future maintenance of the relevant works.	No further discussions have taken place between the applicant and Derbyshire County Council, as Lead Local Flood Authority, regarding maintenance responsibilities for the drainage infrastructure of the scheme. The County Council would welcome engagement with the applicant or their consultants at the earliest opportunity.	<p>Further discussions have been held with the Derbyshire Highways/Drainage lead on 3/03/22 with regards to the proposed drainage infrastructure for the Woolley Bridge Junction and the design of the surface water collection system.</p> <p>Further discussions will be held with Derbyshire as the detailed design progresses for this element of the Scheme.</p>

4. REP6-027 High Peak Borough Council response to the Examining Authority's Second Written Questions

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
9.70.8	1.10	<p>The ExA [EV-016 EV-018] has raised concerns that key principles established for the first iteration EMP should not be lost or watered down in subsequent versions.</p> <p>The Applicant [REP4-006 page 17] has explained the process for the development of the second iteration of the EMP and explained that the second iteration would not follow the first iteration “<i>slavishly</i>”.</p> <p>The Applicant [REP4-006 page 17] said that the first iteration EMP [REP3-010 REP5-012] incorporates the measures for the construction stage referred to in the ES as being incorporated in the EMP. It said that the second iteration would be updated to reflect the finalised design and construction plans and would reflect the mitigation for the consented scheme. The Applicant does not appear to be comfortable for the dDCO [REP5-006] to require that the measures for the construction stage referred to in the ES are included in the second iteration EMP. The second iteration is the version that would be used during construction.</p> <p>a) The ExA is considering whether it can rely on the measures for the construction stage referred to in the ES if their inclusion in the second iteration EMP is not secured in the dDCO [REP5-006]. Please could the Applicant comment? Can a firmer undertaking be secured regarding the mitigation referred to in the ES?</p> <p>The Applicant [REP4-006 page 17] said that the second iteration EMP would contain a record of the consents, commitments and permissions resulting from liaison with statutory bodies and be kept up to date with any material changes during construction and for consultation to be required on those changes. However, the Applicant does not appear to be comfortable for the dDCO [REP5-006] to include those requirements for the second iteration.</p> <p>b) Please could the local authorities comment?</p>	<p>b) Without input from the applicant it is difficult to postulate why the applicant does not appear to be comfortable for the dDCO to require that the measures for the construction stage referred to in the ES are included in the second iteration EMP. Given the further detail in the 2nd iteration, commitment to consultation & to adopt BPM in the REAC (for mitigation) this is not considered to be critical for all the general mitigation proposals highlighted to be included.</p> <p>However, the above noted, where mitigation has been described as embedded and presumed to occur in an associated assessment then there should be a commitment that this mitigation will be included (as impacts have been assessed on this basis).</p>	National Highways has nothing further to add to its previous responses.
9.70.9	1.12	<p>The ExA [EV-016 EV-018] has raised concerns that key principles established for the first iteration EMP [REP3-010 REP5-012] should not be lost or watered down in subsequent versions.</p> <p>The Applicant [REP4-006 pages 18 to 19] has explained the process and legislative requirements for the development of the third iteration of the EMP and said that the third iteration EMP would be developed from the second iteration EMP, which is the version that would be used for construction. The Applicant does not appear to be comfortable for the dDCO</p>	<p>a) More appropriate for DCC to comment if requirement 4(4) requires the 3rd EMP to be prepared in accordance with a process contained in the 2nd EMP, where they would have been consulted.</p> <p>As noted in 1.1 above where any operational mitigation has been described as embedded and presumed to occur, in an associated assessment, then there should be a commitment that this mitigation will be included (as impacts have been assessed on this basis) in the third iteration.</p>	National Highways has nothing further to add to its previous responses.

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		<p>[REP5-006] to require that the measures for the construction stage referred to in the ES are included in the second iteration EMP. The third iteration is the version that would be prepared at handover.</p> <p>a) There are no requirements for approval, or consultation on the third iteration EMP. Please could the local authorities comment?</p> <p>b) Noting that the second iteration EMP is for the construction phase, please could the Applicant advise whether it would reflect measures for the management and operation stage that are included in the first iteration? Is it necessary to ensure that the third iteration reflects measures in the first iteration?</p> <p>c) The ExA is considering whether it can rely on the measures for the management and operation stage referred to in the ES if their inclusion in the third iteration EMP is not secured in the dDCO [REP5-006]. Please could the Applicant comment? Can a firmer undertaking be secured regarding the mitigation referred to in the ES?</p>		
9.70.10	3.5	<p>The Design Manual for Roads and Bridges (DMRB) provides screening criteria for traffic flows which are used to decide whether a detailed assessment is required with particular reference to biodiversity, noise, air quality, and in relation to the effects on the Peak District National Park.</p> <p>a) Please provide, for each relevant environmental topic, the screening threshold set out in the DMRB, providing the relevant paragraph reference in each case.</p> <p>b) Please identify any other recognised screening criteria (Institute of Environmental Management and Assessment (IEMA), Institute of Air Quality Management (IAQM), etc) that have been used or considered, providing the relevant paragraph reference in each case.</p> <p>c) Where there is a choice of DMRB or other screening criteria, please identify the criteria selected and the reasoning for that choice.</p> <p>d) Do the local authorities, Peak District National Park Authority and Natural England have any comments that they wish to make about this matter?</p>	<p>HPBC has accepts that the recommended DMRB screening criteria for national highways road schemes, indicates that both the Glossop and Tintwistle AQMAs would be screened out, based on the traffic figures presented The key concern remains that HPBC would like to have seen the AQMAs, although HPBC appreciate that DMRB has been followed they believe there should be a lower criteria set for AQMA, inline with the principles of the IAQM guidance HPBC considers there to be a good argument for inclusion of both AQMA based on uncertainty in the traffic modelling:</p> <p>- Change in AADT on the A628 in Tintwistle is only fractionally below the DMRB criteria</p> <p>- Concerns over the likelihood of extra (approx. 4K AADT) from the new A57 traffic diverting onto Shaw Lane/Dinting Road rather than only 300 remaining on A57 within Glossop AQMA</p>	<p>These issues are subject to ongoing discussions. Virtual meetings were held between National Highways and HPBC on 4 March and 18 March 2022. The consultation between National Highways and HPBC has been documented in 9.72 Addendum to the Statement of Common Ground with High Peak Borough Council' submitted alongside this document at Deadline 7.</p>
9.70.11	3.10	<p>In their Local Impact Report [REP2-045], Derbyshire County Council identify concerns regarding future capacity at the junction of A57 Brookfield / Shaw Lane / Dinting Vale North and that this will result in local delays.</p> <p>a) Has any specific analysis of the operation of this junction been undertaken?</p>	<p>More detailed analysis is required of the impacts of the increase in traffic using Shaw Lane and Dinting Road. The screening out of the consideration of the AQMA at Dinting is predicated on alternative routes across Glossop being readily utilised by vehicles. Our LIR questioned the suitability of the Shaw Lane and Dinting Road diversion "given this route has a higher number of roadside residential receptors" (paragraph 8.46). Even if feasible, such a diversion is likely to lead to negative impacts which have not been properly considered or</p>	<p>Please refer to National Highways' response 3.6 to the Examining Authority's Second Written Questions (REP6-017).</p>

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		<p>b) Should the specific mitigation be provided to address any resultant additional?</p> <p>c) Has any potential mitigation been considered?</p> <p>d) If so, how would this be secured?</p> <p>e) Would an increase in junction capacity at this junction affect any driver-perceived attractiveness of the Shaw Lane / Dinting Road route for drivers?</p> <p>f) If so, what would be the resulting effect?</p> <p>g) Would any additional diversion of traffic require additional mitigation?</p>	<p>mitigated. Alternatively, if the junction and alternative route are not used as predicted, it is likely that the traffic passing through the AQMA at Dinting will be higher than forecast with consequential implications for air quality. In this scenario, severance and safety issues will also potentially be more prevalent on the A57.</p>	
9.70.12	3.18	<p>There are aspirations, both at local and national level, to transfer journeys to more sustainable transport modes.</p> <p>a) Do you consider that sufficient consideration been given during the assessment of the effects of the scheme to Public Transport networks?</p> <p>b) Is the design flexible enough to provide for any future increase in public transport usage and associated infrastructure?</p>	<p>a) As highlighted in our Local Impact Report, the increased local journey times would likely affect the timing and reliability of public transport services within Glossopdale. This may lead to a decreased desirability to use these services. However, the impact of the scheme on this is not currently clear.</p> <p>b) Please refer to comments from Derbyshire County Council in relation to the suitability of the scheme to support public transport in design terms.</p>	<p>Please refer to National Highways' response to the Examining Authority's Second Written Question 3.17 (REP6-017).</p> <p>Also see Derbyshire County Council response to the Examining Authority's Second Written Question 3.18 (REP6-026).</p>
9.70.13	4.6	<p>Peak District National Park Authority [REP2-048, REP2-055] considers that slight effects could be material to the decision-making process.</p> <p>The Applicant [REP4-008 Item 4o] said that is not in alignment with DMRB LA104 Table 3.7, which is the methodology for the assessment.</p> <p>Please could Natural England, Derbyshire County Council and High Peak Borough Council comment? Has enough consideration been given to all relevant guidance, policy, and legislation, apart from the DMRB?</p>	<p>HPBC is not the highways authority and therefore is not familiar with the detail of DMRB. As such, the extent to which DMRB reflects the wider statutory obligations and policy requirements associated with the need to consider impacts on National Parks is not known.</p> <p>However, in general terms, it is more likely that "slight effects" on a National Park are material to a decision than for other areas given the fragile nature of the environment and degree of protection they are given in the NPPF and local policy.</p>	<p>The methodology used in Chapter 7 of the ES (REP6-006) uses the significance criteria in accordance with DMRB LA 107. The magnitude of the effect is low because there are no direct effects of the Scheme on the PDNP.</p> <p>Please refer to National Highways' response to the Examining Authority's Second Written Question 4.6 (REP6-017).</p>
9.70.14	4.7	<p>Please confirm whether, or not, the Authority is satisfied with the Applicant's explanation regarding confidence in traffic increase figures / screening out of effects on the A628 [REP3-028].</p>	<p>a) Yes. Given the great weight afforded to impacts on national Parks in national planning policy, it is proportionate for the applicant to provide a more detailed analysis of impacts. Whilst it is recognised that the scheme does not include any development within the National Park itself, the impacts of the scheme do extend into the National Park. It is noted that in relation to developments in the proximity of National Parks paragraph 176 of the NPPF states that "development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas." Clearly, there is an expectation that the impacts of developments in the setting of National Parks are fully understood.</p> <p>b) N/A</p> <p>c) N/A</p>	<p>Please refer to National Highways' response to the Examining Authority's Second Written Question 4.4 (REP6-017).</p>

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
9.70.15	5.6	<p>Please could Tameside Metropolitan Borough Council and High Peak Borough Council comment on the outline Landscape and Ecological Environmental Management and Monitoring Plan [REP5-018]? Does they share any of Derbyshire County Council's concerns [REP4-010 Item 4n]?</p>	<p>Yes, we would support DCCs comments.</p> <p>In addition, to Derbyshire County Council's suggestion that the applicant reviews the Landscape Character of Derbyshire publication, reference should also be made to the High Peak Landscape Character SPD.</p> <p>This document provides additional guidance in relation to planting and biodiversity for all character areas, including the "Riverside Meadows" character type that the scheme within High Peak appears to be within.</p>	<p>The Applicant will be happy to consider these publications when developing the detailed LAMP and to discuss them during associated consultations with the local authorities.</p>
9.70.16	7.1	<p><u>Item 8.37.</u> The Applicant has not definitively committed to construction dust monitoring at high-risk sites and said [REP3-006] that it would be considered if necessary to monitor effectiveness of standard mitigation in line with DMRB LA 105 Table 2.108.1.</p> <p>a) Please could the Applicant explain the parameters used to identify whether monitoring would be required?</p> <p>Some high-level information about monitoring is set out in Appendix B7 Nuisance Management Plan to the first iteration EMP [REP3-010].</p> <p>b) Does High Peak Borough Council have any comments on this/ is it sufficient to address their concern about high-risk sites?</p> <p><u>Item 8.38.</u> High Peak Borough Council asked for the A57 Brookfield qualifying features used in the NO2 compliance assessment to be labelled on ES Figure 5.4 [APP-080].</p> <p>c) Is the Applicant able to do this, please?</p> <p><u>Item 8.39.</u> High Peak Borough Council raised concerns about the non-application of adjustment to modelled NO₂ and PM₁₀ concentrations where the modelled values are within 30% of monitored. High Peak Borough Council [REP4-011] suggest they are concerned about over representation of beneficial effects.</p> <p>d) Please could the Applicant to comment on this, and any implications for the conclusions on effect significance?</p>	<p>Meetings on AQ are ongoing with the applicant, with the next meeting scheduled for 18/3/2022.</p> <p>It would be appropriate to defer the responses on AQ until after this meeting.</p>	<p>As stated in our comment on HPBC's response to written question 3.5 (above) virtual meetings were held between National Highways and HPBC on 4 March and 18 March 2022. These discussions have been documented in ' 9.72 Addendum to the Statement of Common Ground with High Peak Borough Council' submitted alongside this document at Deadline 7.</p>
9.70.17	9.3	<p>The Applicant [REP2-021 Q6.5] said that "<i>major adverse magnitude of impact</i>" [REP1-015 Table 6-3] equates to substantial harm, while lesser magnitudes of impact equate to less than substantial harm.</p> <p>a) Do the local authorities or Peak District National Park Authority have any concerns about the equivalence of magnitude of adverse effect to level of harm or whether the NPPF tests have been addressed correctly?</p>	<p>It is noted that the applicant's response to Q6.5 states: Whether harm is substantial or less than substantial is considered on an individual asset basis and is not a blanket measure reflected in the significance effect.</p> <p>This appears to contradict the approach set out in Table 6-3 which equates substantial harm to "major adverse" impacts and less than substantial harm to "moderate adverse".</p>	<p>Harm to significance of an asset is assessed through the measure of magnitude of impact, as opposed to significance of effect. Under this measure, substantial harm is defined as a major adverse impact. This is set out in Table 6-3 of the Environmental Statement.</p> <p>The assessment of significance of effect considers magnitude of impact upon the significance (termed as value in the Environmental Statement) of an asset, as set out in Table 6-4 of the Environmental Statement. This enables comparison</p>

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
		<p>Please could the Applicant update the ES to include the explanation and clarify how the NPPF tests have been addressed?</p>		<p>between impacts upon assets of differing significance/ value, and enables greater weight to be assigned to impacts upon assets of higher significance/ value, in accordance with paragraph 199 of the NPPF.</p> <p>For instance, substantial harm to an asset of low value, would be assessed as a major adverse magnitude of impact, resulting in a slight or moderate adverse effect. Substantial harm to an asset of very high value would also be assessed as a major adverse magnitude of impact, however, would result in a very large adverse significance of effect.</p>

5. REP6-030 Sharefirst My Journey to School response to the Examining Authority's Second Written Questions

Response reference:	Representation Issue	National Highways Response at Deadline 7
9.70.18	<p>Sharefirst my journey to school 20029723 – Deadline 6 – Response to 2nd written questions from the examining Authority.</p> <p>Dear sirs, As part of the Examining Authority's Second Written Questions, Interested Parties have been requested to submit views on overall assessment methodology for climate change as part of the scheme (8.5 Climate Change Overall Assessment Methodology) .</p> <p>The Applicant states that in Environmental Impact Assessment terms there are no established criteria or threshold that can be used to define whether GHG emissions due to a project can be considered significant and the ExA asks for views around taking into account previous judgements on comparator schemes. We were made aware in the Hearings that significant levels for air quality have also to be determined.</p> <p>The Transport Decarbonisation Plan recognises the importance of road improvements as part of the solution to reduce congestion. Community engagement, added Community Voice and additional Unaccompanied Site Inspections by the Planning Inspectorate in response to community concerns of the A57 Link Roads Scheme can only continue to enhance the environmental credentials of the A57 Link Roads Scheme and set it apart from comparator Schemes.</p> <p>There is unique regional context in Derbyshire at this present time with the pending decision of funding for implementation of the DCC Bus Service Improvement Plan and the proposed network of new Transport Hubs across Derbyshire, including a Glossop Transport Hub, bringing unique regional context to the A57 Link Roads Scheme. This potentially offers a springboard for new opportunities for integrated sustainable travel and enhanced environments, to move the dial to the next level.</p> <p>Supporting R&D, with funding and guidance programmes and enabling trials for potential demonstration projects and potential innovative technologies can help move in an agile way towards establishing criteria and thresholds for GHG emissions and air quality. Perhaps the A57 Link Roads Scheme can set a new exemplar for Environmental Impact Assessments moving forwards.</p>	<p>The suggested measures contained in this response relate to locations outside the DCO boundary and not on the Strategic Road Network. As such they are a matter for Derbyshire County Council to consider as local highway authority.</p>
9.70.19	Sharefirst my journey to school 2009723 – Deadline 6 – Community voices.	

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>I regularly see people walking to school slipping on inclines when the path is muddy <i>Local high school student</i></p> <p>If we could have half of what they've got on the A555 Airport Relief Road we'd be happy <i>Local high school student</i></p> <p>Close proximity of traffic and speed of traffic to equestrian riders can cause horses to react differently to humans <i>Local horse rider</i></p> <p>It took me 3 years to get improvements to a local footpath so mums could walk with their prams and children to school away from the road <i>Local mum</i></p> <p>I've been campaigning for over 6 years for action on safety of the Dinting Road crossing point. I have seen a number of Near Misses on a well-used school route. We now have the funding. When will improvements to the crossing be made? <i>Local mum and school governor</i></p> <p>Wouldn't it be great to have a safe cycle route and multi-user access route away from the road from Shirebrook Park, via Glossop and all the way to Glossopdale School, and beyond to TPT, Longdendale Trail and NCN62. <i>Many local residents</i></p> <p>Sharefirst My Journey to School hopes this document helps to bring added Community Voice to the Unaccompanied Site Inspection by the Planning Inspectorate to the Dinting area to consider matters raised by Sharefirst My Journey to School as part of the Examining Authority process for A57 Link Roads Scheme. In the notes which follow, various stakeholders and Sharefirst My Journey to School:community interest group have raised a number of suggestions to help continue to support a sustainable planning balance, decision-making and a statement of Common Ground for Glossop. Included in Appendix A and B are notes from a couple of local community meetings about the Dinting area, surrounding villages and onwards to Glossop and Snake Pass. Suggestions listed below.</p> <ol style="list-style-type: none"> 1. Reduce slips, trips and falls, the #1 cause of accidents by far, by improving safe, multi-user access for local public rights of way all year round, for community wellbeing all year round. Some local public rights of way are considered passable only in a boot rather than a school shoe in winter. Space for changing facilities on school premises is limited, presenting daily challenges for storage of outerwear for all weathers or changes of footwear; 2. Potholes in roads can cause accidents for users of mobility scooters; 3. Safety of the Dinting Road crossing point has been of concern in the community for a number of years where students walking, cycling, travelling by road, bus or train to school cross Dinting Road. The crossing point is used significantly by students at peak school travel times and by all of the community of all impairments and mobilities to access leisure at all times of day. Please find notes from 2 meetings organised by Sharefirst My Journey to School in June 2021 with our local MP Robert Largan and local residents and in November 2021 to see what can be done to help improve safe crossing of Dinting Road. See Appendix A and B below for further detail; 4. Continue to improve local safety and access for equestrian users by enhancing multi-user access and improving the equine crossing point near to the recycling centre on the A57 close to the proposed Glossop Spur Road exit. Extend the Pennine Bridleway for leisure enjoyment of a new off-road Trans Pennine Trail route to Bottoms Reservoir, Longdendale Trail and NCN62; 	

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<ol style="list-style-type: none"> 5. Connect the Longdendale Valley from Bottoms Reservoir with Hayfield and Glossop, over Monks Road. Sharefirst My Journey To School has identified opportunities for more connected footpaths, cycleways and bridleways and can offer assistance with both mapped routes and future mapping of routes; 6. Local equestrians are equally concerned about knock on impacts of anticipated traffic volume increases for horse-riders through Charlesworth and Broadbottom; 7. Looking towards Tameside and Greater Manchester, there are opportunities to better connect Hadfield, Broadbottom and Hattersley to Godley Turntable for wider off-road access to Greater Manchester; 8. A collective package of projects to support a sustainable planning balance in Glossop can help continue to improve air quality, create local jobs, improve local skills and training and have a positive impact on biodiversity, the environment, leisure time and community wellbeing. 9. Continued integration and long term investment to continue to improve safety, quality and sustainability of local school journeys can continue to strengthen, improve and encourage participation in sustainable travel to school. 10. Distributing traffic flow and access to routes throughout conurbations is an opportunity which can help ease traffic congestion and better maintain air quality. One way that has been considered in High Peak is bringing empty properties back into use. Repurposing Empty Properties reduces embodied carbon and can ultimately assist improvements to biodiversity and the environment for community wellbeing, carbon reduction and delivery of net zero carbon commitments. Further information can be provided. 11. There could also be an opportunity to ask Glossopdale School and Sixth Form for participation through their Student Voice Forums which could be organised by Tracy-Jane Fielding, School Governor for Health and Wellbeing, Community and Travel. 	
9.70.20	<p>Appendix A - Notes from Sharefirst My Journey to School meeting with local residents, Glossopdale School and Sixth Form (Health and Wellbeing, Community and Travel Governor) and Robert Lorgan MP 17.6.21</p> <p>Safety at Dinting Road Crossing Point – Local Community Discussion Concerns</p> <p>We discussed a number of concerns including existing speed limits 40mph on the brow of a hill which additionally prevents approval of the footpath route by Sustrans; proximity to Dinting railway station; increased footfall as a result of staggered start and finishes to the school day with students using both front entrances and rear entrances to help mitigate infection in the pandemic; increased footfall as a result of relocation of the school site in 2018. The school governor present confirmed this footpath route is a significant and well-used route for students from Glossop, Simmondley, Gamesley and those travelling by train to Dinting Station, or arriving by bus at the bottom of the footpath on the A57 by Dinting Arches. We agreed we needed to consider the whole route. The group discussed a number of options, and recommended the following:</p> <ul style="list-style-type: none"> • Timed 20mph zones for Dinting Road Crossing Point, similarly to those in Padfield and Broadbottom; 	

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<ul style="list-style-type: none"> Remove obscuring vegetation from 30mph sharp bend sign approaching the crossing from Glossop; Review lighting on Dinting Road which lights the road rather than the path and is only on one side; Review options to enhance a safe crossing facility and public right of way to adequately accommodate the needs of deaf students, disabled students and students with other impairments; Review sensitive lighting options for the existing PRow, commensurate with the surrounding meadow land and access and use of the new Glossopdale School community leisure facility over extended hours beyond the school day and use of the public right of way for leisure and wellbeing beyond the school day; Maintain assurances the £50k funding allocated towards an improved safe crossing point will be ring fenced and not lost as part of any other development plans; Review future budget, resources and funding for example for a Public Rights of Way Officer in order to support continued and improved monitoring and maintenance as a result of heavier footfall from relocation of the school site and heavier use in mitigation measures to help protect safety of students and staff in the pandemic. <p>Safe Access using Front and Rear Entrances to Glossopdale School School action in order to help achieve segregation and staggered start times to help mitigate against risks of infection in the COVID-19 pandemic has resulted in increased and heavier use of access to both front and rear entrances. In addition and uniquely to Glossopdale School relocation of the school site in 2018 and heavier use by students as a result has placed added pressure on local Public Rights of Way in the area. The group recommends that as a result, local Public Rights of Way for safe access to school may require an increased budget in order to better support maintenance and monitoring of local PRow in light of the impacts of heavier use. One suggestion by the group could</p> <p>be funding and budget allocation to help additionally support a PRow monitoring officer(s), given the value and emphasis on safe outdoor access continuing across the country in the pandemic.</p> <p>Front Entrance At the front entrance there is increased parking on footpaths requiring students to move into the road in order to continue their journey and a number of near misses have been observed. Construction traffic for a small housing development at The Shaw has caused obstruction and blocked access to existing routes, created hazards Dodging Diggers, and longer journey times using routes to avoid The Shaw.</p> <p>Rear Entrance A document highlighting issues with the existing Public Rights of Way GLO FP201 and GLO FP 65 at Dinting Road Crossing Point from a walk in January 2021 carried out by Sharefirst My Journey to School and further inspection by the Peak and Northern Footpath Society was shared with all those attending.</p>	

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>Public Rights of Way Standing water due to pockets forming as a result of heavy use, current surface quality and poor drainage and vegetation creates safety issues and the recommendation to wear a boot to walk the path safely in the weather conditions seen in January. We all agreed students should be able to wear their school uniform with pride and we agreed one way forward could be to consider improvements to the surface in order to improve drainage and avoid standing water when wet, slippy, muddy paths, particularly on gradients create trip hazards, discomfort for the school day and create a barrier to students, staff, parents, carers making journeys away from the road in poor weather and particularly in winter time. We agreed safety improvements to the surface should be carried out sensitively and commensurate with the existing landscape.</p>	
9.70.21	<p>Appendix B - Extract of notes from Sharefirst My Journey to School Community and Elected Members Meeting 30.11.21, arranged by Sharefirst My Journey to School to continue discussions of safety of the Dinting Road Crossing Point. Attending were various stakeholders, with representatives from Sharefirst My Journey to School; SPEED Bridleways; High Peak Access; Derbyshire County Council; Glossopdale School and Sixth Form; Peak and Northern Footpath Society.</p> <p>Extract of notes from Sharefirst My Journey to School Community and Elected Members Meeting 30.11.21, arranged by Sharefirst My Journey to School to continue discussions of safety of the Dinting Road Crossing Point. Attending were various stakeholders, with representatives from Sharefirst My Journey to School; SPEED Bridleways; High Peak Access; Derbyshire County Council; Glossopdale School and Sixth Form; Peak and Northern Footpath Society.</p> <ul style="list-style-type: none"> The group was unanimous in considering that at least a temporary surface upgrade should be undertaken given the issues observed with the paths in winter weather 2021 and risks to student safety using the paths that have been observed. These should be carried out independently of pending planning application decisions. Surface upgrade proposals will require landowner approval; We touched on the impact of the planning application to the path FP201 across the land. We agreed increased potential safety hazards arising as a result of as a result of the new path route and increased likelihood of students spilling into roads is a key concern across the group. Concerns were also raised around additional new potential hazards for example arising from access of heavy construction vehicles to the construction site during school hours. It is likely that conditions to the planning application may be necessary, for example on hours of delivery, to ensure student safety given close proximity of the building site to the school; The group was unanimous that Glossopdale School and Sixth Form should be consulted and involved in the design for the safety improvements to the Dinting Road Crossing Point and that the final design should support all students and residents, disabled, deaf, partially- sighted or with other impairments with safe crossing of Dinting Road and access to the paths. High Peak Access may also have valuable advice and input. 	

6. REP6-033 CPRE Peak District and South Yorkshire Branch response to the Applicant's ISH2 post-hearing submission at Deadline 5 and response to the Examining Authority's Second Written Questions

Response reference:	Representation Issue	National Highways Response at Deadline 7
9.70.22	<p>1. We commented on the ExA's question on cumulative carbon effects arising from ISH2 in REP5-029 paras 20-25. We understood that NH might undertake new model runs using the Decarbonisation Strategy. We have consistently said that:</p> <p>i) the original option testing did not take into account Government policy since 2015 including the Decarbonisation Strategy (this seems to be agreed). The need for a new run justifies our position that alternatives need to be reconsidered in light of those policies.</p>	
9.70.23	<p>ii) the detailed modelling and forecasts originally submitted to the DCO did not take into account the traffic reductions required in the most recent documents including the Decarbonisation Strategy and CCC 6th budget. In view of the way in which the assumptions used would determine the outcome of the tests we called for a robust and transparent process including a run with traffic predicted from the full Decarbonisation Strategy without the A57 scheme. This would form a realistic Do Minimum which could then be compared to a run with the scheme and a Business as Usual level of traffic. This is the real basis for comparison and we showed how this would work in our Deadline 4 submission.</p> <p>The reason for this approach is that a package which supports both car use and sustainable travel at the same time will achieve less sustainable travel than one which focussed on sustainable travel alone. We have not seen any argument which contradicts this and it would be extraordinary if one were made since it would undermine the whole basis of the economic calculations of the scheme benefits. We have calculated and submitted at Deadline 4 the scale of the negative impact in the relevant areas using the data supplied (£110million).</p> <p>We understand NH have now undertaken new model runs and are quoting new data using assumptions from the DfT Decarbonisation Strategy and a newer version of the assumptions on electrification (REP5-026). We have asked NH for the basic data from these runs which should be readily available. No special link analysis is being requested.</p> <p>The data we are asking for is the equivalent highway and public transport matrices, changes in walking and cycling, automatic TUBA outputs, Economics Table and new BCRs and any GHG worksheets they have used for the new runs, we understand there are at least two. This should be completely standard and we can then see them in the context of the work we have done on the existing model data. This is essential if the new runs are being used to inform the DCO.</p> <p>It is important for the DCO to see at the very least these summary statistics if the new modelling is to be used for two reasons. The first is the status of the old option assessment and subsequent modelling (see below). In addition, the data from the new model runs should enable the real comparison of the situation with and without the scheme. We are prepared to do this as soon as the information arrives.</p> <p>It is essentially two different forecasting scenarios which should be tested:</p> <p>i) Increasing road capacity in a metropolitan area to allow the central forecast for traffic growth to occur</p>	<p>As stated in the Applicant's response to Issue Specific Hearing 2 Item 6 c) and d) Cumulative Carbon Assessment (REP5-026), traffic modelling for the Scheme has been undertaken in line with Transport Appraisal Guidance published by the Department for Transport (DfT). This traffic modelling has not changed. The only change is the Emission Factor Toolkit (EFT) (version 11) has been used to calculate the operational GHG emissions. The EFT now includes data relating to the UK vehicle fleet and associated emissions for the period between 2031 and 2050 inclusive. EFT v11 also includes greater uptake rates of electric vehicles, aligned to electric vehicle penetration rates described in worksheet labelled 'A1.3.9' of DfT's Databook for all road types (motorways, urban and rural) listed in EFT.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>ii) Implementing a package promoting sustainable options which creates mode shift and thus lower traffic levels to meet the Government policies for such areas.</p> <p>It is the difference between the two scenarios which is the key to assessing strategic fit and value for money of the scheme. This type of scenario testing, which can use modelling to test and refine it, is well established, for example used by TfGM to develop its Transport Strategy¹.</p>	
9.70.24	<p>Status of original modelling</p> <p>This a key question for the DCO which we have raised with NH. Are NH now saying that the original modelling needs to be withdrawn since, as we have consistently argued, it didn't take the latest Government policies into account?</p>	<p>The data in Table 1 of the Applicant's response to Issue Specific Hearing 2 Item 6 c) and d) Cumulative Carbon Assessment (REP5-026) supersedes the results in Chapter 14 of the ES (REP1-019), which is now out of date as it was prepared using EFT v10.1.</p>

7. REP6-034 Daniel Wimberly comments on Deadline 5 Submissions

Response reference:	Representation Issue	National Highways Response at Deadline 7
9.70.25	<p>Highways England, in their document 9.53, have submitted to this examination their replies to many of the points which I raised in my Deadline three submission. For the references for these two documents see the box above. For each reply which Highways England have made, I have copied in full both the extract which they copy from my DL 3 submission, to which they reply, followed by their reply. I then present my comments to their reply. My thanks go to Highways England for these replies as they enable the discussion to progress. Many important points are clarified in my comments to their replies. I have attempted to summarise the key points to emerge in the next section.</p> <p>Rather than tiptoeing around issues, as is commonly thought to be the English way, I have called the spade a spade where necessary. I think this gives a clearer view to the ExA and to other stakeholders of what the key differences of opinion, disagreements over facts, and attitude actually are.</p>	No response required
9.70.26	<p>Summary Five examples of the discrepancies and implausibilities in the results of HE's traffic modelling are brought to light in this document: the "Market Street anomaly"</p> <p>the Bamford anomaly: a forecast drop in traffic through Bamford whilst the traffic increases by 38% on Snake Pass is implausible</p> <p>the fact that HE's modelled flows on the M67 link for 2025 Do-Minimum are the same as their 2015 modelled flows, and this is not credible the DfT figure for the M67 in 2019 (based on an actual count) is far far higher than HE's modelled prediction for 2025, which casts doubt on the latter, and HE's claim that there would be no more traffic in the area if the scheme were to be built than if it were not is contradicted by the evidence, principally the fact that traffic flows on the M67 are modelled to be 7500 more in 2025 with the scheme than without it, and this traffic must give rise to additional trips.</p>	See National Highways responses below.
9.70.27	<p>In the light of the above, the model and its outputs must be reviewed. Please will the ExA carry out this review. (Request to ExA) NOTE: The switch of consultants in mid-project and its effects on the modelling and its outputs, in particular on predicted flows in AQMAs, must be part of such a review.</p> <p>The factors involved in the model, the values assigned to these factors and the weighting given to these factors have NOT been stated for stakeholders in any of the public-facing documents, such as the Case for the Scheme or the TAR.</p>	See National Highways' response below.
9.70.28	<p>In denying the public this fundamental information HE are not complying with their own licence, nor with the Nolan Principles.</p> <p>Data, especially data which puts into question the wisdom of proceeding with this scheme, should be made fully visible in the name of transparency and good ordering of the EiP.</p> <p>Do-Something and Do-Minimum traffic flows should be compared with a baseline, the nearest possible to "current" flows.</p> <p>This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation. If comparisons are made solely between Do- Something and Do-Minimum, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out, as not meeting the criterion.</p>	

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>ALL the adverse impacts of the scheme have to be added up and compared with the benefits – see Planning Act section 104, subsection 7, as repeated in NPS-NN paragraph 1.2. Leaving out the baseline means that adverse effects are not fully captured. This also has a chilling effect on consideration of alternatives to the scheme. HE seem to want to suggest that the scheme does not increase traffic in the area. The evidence shows that the scheme does increase traffic in the area.</p> <p>The adverse impacts of the additional traffic being routed into residential streets in Glossop by the scheme matter and have to be given full consideration at this EiP. HE have provided no information to the EiP on these impacts. They should not be wished out of existence by a public authority such as HE.</p> <p>The additional traffic which is predicted on these local roads will quite likely be bunched, exactly like the existing traffic, thus increasing the scale of the negative impacts.</p> <p>The increases in traffic, including the bunching effect, in Glossop’s residential streets are indeed significant and will have a significant negative impact on many aspects of people’s daily lives, including increasing accidents, if the scheme is built.</p> <p>HE should not take refuge in obsolete guidance, but assess these impacts in a proper, rigorous manner.</p>	
9.70.29	<p>HE’s failure to look at these issues of impacts in local roads in Glossop seriously, or to present proper evidence to this Examination in Public, is not compliant with subsection 7 of section 104 of the Planning Act 2008</p> <p>There must be a proper assessment of the additional severance, safety, and other issues, including the impact on bus services, caused by the projected increase in traffic on minor roads in Glossop. Specifically the assessment should include the provision by the applicant of a series of clear maps showing the traffic flows as they are now, and which they are predicting with and without the scheme, throughout the area, in the opening and design years, so that we can all assess for ourselves whether the effects on pollution, severance, accidents, intimidation etc. and bus services sticking to time, being asserted by different parties, are reasonable or not.</p>	<p>National Highways has undertaken a proper assessment of the impacts of the Scheme on pollution, severance, accidents intimidation and bus services. For several of these impacts there are no agreed criteria or thresholds for identifying significant effects and the consequently, the determination of significance is based on professional judgement.</p>
9.70.30	<p>Please will you ask the applicant to carry out this assessment? (Request to the ExA) NOTE: this action could be part of the rewrite of the TAR which is needed on other grounds as well, see my DL5 submission.</p> <p>In the Peak Park, just as in Glossop, if you add the additional traffic being forecast mostly at the same times as existing traffic, then you get far larger and more significant negative impacts at peak times than if you add this extra traffic as if it is exactly evenly spread throughout the day.</p> <p>HE’s assertions that “for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop” (in this document) and “It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion” (in the TAR) cannot be reconciled and cast doubt on their credibility.</p> <p>The scheme’s proposers ASSUME a given level of traffic growth. Which is then “disappeared” from consideration, and we just get, all the time, DS vs. DM, (Do-Something vs. Do- Minimum) thus obscuring the issue of the background growth, which is itself problematic. This omission of consideration of the baseline reduces the amount of adverse effects to be taken into account in screening decisions, and also makes traffic growth look inevitable, rather than something which is in fact highly malleable and could be lowered by effective local measures, as the government is now calling for</p>	<p>The traffic modelling on which the assessment of the Scheme is based models the AM, Inter and PM peak periods, so does not spread the changes in traffic flow evenly throughout the day.</p> <p>Regarding the impact of the Scheme on bus services please see National Highways’ response 3.17 to the Examining Authority’s Second Written Questions (REP6-017). Both the Do-minimum and the Do-something scenarios include growth in traffic demand between the Baseline and both 2025 and 2040 and is therefore included in the assessment of the impacts of the Scheme.</p>
9.70.31	<p>According to the Planning Act 2008 section 104, subsection 7, the ExA is implicitly tasked with comparing adverse effects of the scheme against benefits. With this frame of reference, and bearing in mind the previous point, an alternative package is likely to deliver a far better benefits to adverse effects ratio than the scheme. Will the ExA confirm that consideration of such alternatives will be given full weight, in line with adherence to the Planning Act? (Request to ExA)</p> <p>Technical information such as that contained in the 790 page bundle released to the EiP by the CPRE should be made available by the applicant to stakeholders as soon as it is available, and not withheld, and there should be no untoward delays in compiling it.</p>	<p>National Highways has no comment to make</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
9.70.32	<p>Topics – DW text, HE replies and DW comments on replies TOPIC 1 - THE TRAFFIC MODEL DW The overall accuracy of the picture (i.e. of the flows predicted by the traffic model) we are being presented with is questionable. Some things we are being told are hard to believe, there are major discrepancies, etc. Some form of independent peer review will be needed to address this matter. REPLY BY HE The traffic modelling used for the assessment of the Scheme has been developed, calibrated and validated in full accordance with Department for Transport’s (DfT) Transport Analysis Guidance (TAG). Forecast traffic growth is based on factors derived from the DfT’s National Trip End model in combination with forecast changes in traffic volumes due to committed developments and schemes. The traffic modelling has been subject to compliance with validation metrics, internal quality control by the consultants undertaking the modelling (Atkins) and independently reviewed by a separate team within National Highways. National Highways is therefore confident that the traffic modelling used to assess the Scheme is both fit for purpose and robust</p> <p>DW COMMENT ON REPLY</p> <p>This is classic process-not-outcomes talk. ‘Look we have followed this and that guidance, books of methods, etc.’ I noted in my submission the impression given to the reader by the bundle of documents 790 pages long. They speak of a process honed to a T, a process which covers all bases, is mature, and reliable. It looks convincing. But that is all beside the point, completely beside the point. This is all a diversion from my point – that the RESULTS are, “hard to believe, there are major discrepancies, etc.” If the 790 pages of technical description produce results that are hard to believe, then maybe HE could explain? I believe that the ExA should ask them to do just that. (Request to ExA) At the time I wrote Deadline 3 submission I was aware myself that ‘something felt not right’ and that HE’s answers to questions were inconsistent. Their claim that there would be no more traffic in the area if the scheme were to be built than before seemed to be obvious nonsense, and in direct contradiction of what they themselves had said, and I demonstrated this in that submission I was led to the inadequacies of the model and to HE’s cavalier approach to the selection of which evidence to reveal and which evidence to conceal, by the work of CPRE in uncovering the facts around the side streets in Glossop, facts which were not made public at cons I have now done extensive research myself, and above all I have focussed on presenting the information CLEARLY and on highlighting WHAT DOES NOT MAKE SENSE. See Library REP5-039, (presentation in power-point form with bar charts, showing the predicted traffic flows around the network), and Library REP5-040, where I explain this presentation in detail. For a shortcut to the essential points, see pages 4 and 5: section headed “OVERVIEW - KEY MESSAGES FROM THE CHARTS” Returning to HE’s statements about the trust-worthiness of their model, I note that the factors involved and the values assigned to these factors and the weighting given to these factors have NOT been stated for stakeholders in any of the public-facing documents, such as the Case for the Scheme or the TAR. Maybe, for example, the value assigned to traffic growth is incompatible with the NZ2050 Strategy. You, Sirs, and all stakeholders as well, are being asked to take the trust- worthiness on trust, in that we are not being allowed to see how this works. I have specifically asked for this information, back in 2020 – sigh – and been refused. In denying the public this fundamental information HE are not complying with their own licence, nor with the Nolan Principles, Their 2015 licence states: "Consultation" means consultation or engagement proportionate to the circumstances in accordance with government guidance on consultation principles fn1; The footnote takes the reader to the government principles on consultation as published by the Cabinet Office, in whatever form its latest version takes. The reference is here:</p>	<p>The Scheme results in a redistribution of traffic flows across the whole of the modelled road network but does not result in an overall increase in traffic demand. The redistribution of traffic due to the Scheme does, however result in increases in traffic on several roads in the vicinity of the Scheme, since some traffic is rerouting from alternative routes across the Pennines and from elsewhere, sometimes from routes quite remote from the Scheme, such as the M62 and A6/A623.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>Relevant is the following extract: "C. Consultations should be informative Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated impact assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector."</p>	
9.70.33	<p>TOPIC 2 – DATA “NON GRATA” – i.e. DATA UNWANTED AND UNLOVED BY HE DW</p> <p>Some data appears to be “data non grata” – data which is being kept, if not totally under wraps, at least, decently out of normal sight. This data should be made fully visible in the name of transparency and good ordering of the EiP. REPLY BY HE</p> <p>The Transport Assessment Report has been prepared in accordance with best practice guidance and presents all the key changes in traffic flows due to the Scheme across the affected road network in sufficient detail to enable a full understanding of its likely impacts. DW COMMENT ON REPLY</p> <p>Firstly, a general point about the TAR. It is an astonishing claim for HE to make, that it “has been prepared in accordance with best practice guidance” On Accidents, Alternatives, Buses, Climate change, Glossop, HGV's, Journey times, Reliability, Severance and Trains the TAR is lamentable. Much necessary information is simply missing and the presentation of what is included is highly selective. Fortunately I do not have to debunk it here. I refer stakeholders and the ExA to my detailed 17 page critique in my Deadline 5 submission: Library REP5-040, pages 16-33. One question however should go to HE – which guidance was this that they followed? Either it was guidance specially selected to allow the writing of an empty TAR which is in no way an assessment of anything, or the guidance was real enough and it was not followed. The point stands: data, especially data which puts into question the wisdom of proceeding with this scheme, should be made fully visible in the name of transparency and good ordering of the EiP.</p>	<p>The Transport Assessment Report (TAR) (APP-185) was prepared in accordance with industry standard best practice which is based on previous Department of Transport (DfT) guidance on the preparation of transport assessment that was withdrawn several years ago and not subsequently replaced by alternative guidance. Therefore, currently there is no guidance regarding the preparation of transport assessments for transport schemes.</p>
9.70.34	<p>TOPIC 3 – WHAT SHOULD WE BE COMPARING WITH WHAT IN THE MODELLING? DW</p> <p>At many junctures we are told that x, y, or z cannot be examined in detail. X, y or z has been “screened out” or “scoped out” because it did not meet some relevant criterion and this always comes back to statements by HE to the effect that: – ‘the difference between Do- Something and Do-Minimum is not great enough to trigger investigation.’ I believe that underpinning this mass non-investigation of matters, all of concern and some of them of extreme concern, lies a systematic methodological flaw which can and should be remedied. REPLY BY HE</p> <p>Screening out small changes in traffic flows from an impact assessment is industry standard best practice. DW COMMENT ON REPLY</p> <p>If the proposer of a scheme such as the one before us were to compare D0-Something traffic flows with a baseline, which would ideally be the nearest they could get to “current” flows, then the “increases” would be larger than the ones that they would register if the comparison were made with Do-Minimum. This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation. If on the other hand the opposite were to happen, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out, as not meeting the criterion, which is usually stated as there being a specified increase, in other words a limit value which has to exceeded for the assessment to be thought necessary. So my comment on HE’s reply is twofold. First, these are NOT small increases. Remember that under the Planning Act 2008 section 104, the task is to add up all the adverse impacts of the scheme and compare them with the</p>	<p>Please refer to National Highways’ comments on Mr Wimberley’s (12th comment - REP5-021).</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>benefits. As we know, air pollution damages people's health. Any increase in concentrations causes impacts. "Guideline levels" are political constructs which are irrelevant to the task in hand, although legal limits, as we have seen in this examination, do have the use of focussing attention. . What matters is the science. I hope to cover this more fully in another part of my DL 6 submission.</p> <p>Secondly, my point re comparing the flows being predicted with the scheme to the flows being predicted without the scheme, being misleading stands. A lower baseline, namely current flows, will lead to bigger gaps in the figures and hence an increased chance of scoping IN rather than OUT.</p> <p>(Of course the DM figures of HE being used at this EiP seem to be artificially low and are consequently highly suspect, but that is a separate issue. I am talking here of what one might expect to happen with respect to screening in or out, under normal predictions.)</p>	
9.70.35	<p>TOPIC 4 - THE MOTTRAM MARKET STREET ANOMALY DW</p> <p>HE replies Q.3.11 HE's explanation of the forecast increase in traffic DS-DM on Market Street in Mottram, appears to be plausible. However my concern with the forecasts at Market Street (site number 6 on the maps on pages 52 and 53 in CftS,) is that the 2 streets south of Market Street (sites 4 and 5) which feed traffic into, and take traffic from it, each has a far larger flow than Market Street itself. How can this be? HE REPLY</p> <p>Traffic flows across the whole road network are forecast to increase with or without the Scheme. The Scheme changes the distribution of forecast traffic flows across the road network, with resulting increases in traffic on some roads and decreased traffic flows on other roads compared to without the Scheme. The Scheme does not result in an overall increase in traffic across the whole modelled road network compared to without it. DW COMMENT ON REPLY</p> <p>Two points, one related strictly to the point I was making about Market Street and the two roads south of it, and the other a more general point arising from HE's comment. First, I do not deny that if the scheme is built, there will be increases in traffic on some roads and decreases in traffic on others. But Highways England have not answered the point I am making, which is that the traffic flows on Market Street and the two roads to the south of Market Street seem to be incompatible with one another. I am not alone in saying this, CPRE have noticed this too. It would be helpful if HE were to explain! The second point refers to Highways England's claim in this reply that there is no increase in traffic across the whole modelled Road network if the scheme is built. That is not what I remember from the bar charts which I created - so let's take a look. Slide 21 clearly shows that the traffic on the M67 is much higher if the scheme is built both in 2025 and in 2040 than if it is not. . Looking at specific roads the roads which are bypassed by the scheme, Hyde Road and Mottram Moor, both show a big reduction in traffic, while most other roads show increases. But the point is the biggest Road coming into this area, namely the M67, shows a very big increase in two-way traffic and that traffic must go somewhere or come from somewhere. And that is what Highways England are not explaining when they say that there is "no overall increase in traffic" with the scheme.</p>	Please refer to National Highways' comment 9.54.70 on Keith Buchan obo CPRE PDSY deadline 4 submission (REP5-022)
9.70.36	<p>TOPIC 5 - 'TRAFFIC WILL NOT INCREASE OVERALL' DW</p> <p>'traffic will not increase overall'</p>	Traffic demand is forecast to increase regardless of whether this Scheme is implemented. This additional traffic demand will result in increased traffic flows across the modelled road network, but the distribution of the additional traffic across the road network will vary depending on where there is and where there isn't reserve

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>7.1 HE replies Q.4.1 Fust this is irrelevant to the question asked. No one is talking about whether there is more traffic in total in this area with or without construction. The question is: is the new to-be-constructed-perhaps road “inappropriate development”? If it does, then the question of justifying this intrusion has to be faced and at that point, issues such as the overall value of the road do arise. And, yes, the road clearly destroys the open and “natural” character of this land - it is strange for anyone to pretend otherwise. So - there has to be a good reason for doing this “inappropriate development” so . . .</p> <p>Second, and more near to my concerns in this theme, is whether this statement can be true. It is a very puzzling claim. Some points: In their answer to question 3.6 HE say that additional traffic is forecast to be attracted to the new link road from alternative routes. In RR-0677-1 HE a) already admitted the re-routing (attraction) effect, b) stated that by 2040 the DS flows will be 10% more on the A628 and 38% more on Snake than the DM flows. And then claimed that the total traffic kilometres over the appraised network will be the same with the scheme as without it. This claim, together with the admissions re the increases, is made repeatedly in REP1-042 And yet I remember clearly that the overall picture which HE paints in CftS and TAR, and in CB also, is of a steady increase in traffic generally, and by extension in this area. Is this the case, or not?</p> <p>HE REPLY</p> <p>Traffic flows across the road network are forecast to increase both with and without the Scheme compared to the current baseline situation. The Scheme results in a redistribution of traffic on the affected road network compared to the do-minimum, with some roads forecast to see increases, but these increases are balanced out by reductions on other roads. The redistribution of traffic does not, however, result in any significant overall change in total vehicle kilometres. There is a roughly equal increase in overall vehicle kilometres in both the Do-something and Do-minimum scenarios compared to the current basehne situation due to forecast traffic growth.</p> <p>DW COMMENT ON REPLY</p> <p>There are three points to make here. First Highways England say: “Traffic flows across the road network are forecast to increase both with and without the Scheme compared to the current baseline situation.” On the face of it, this is exactly what you would expect. However the bar charts tell a completely different story. Here is slide 14: In this slide we see that the 2025 DM traffic flow on the M67 is going to be, according to the model, almost exactly the same as it was in 2015. Maybe there are some very special factors at work in Glossopdale. Well no, because we see from the Department for Transport 2019 figure that traffic on the M67 increases substantially between 2015 and 2019. And so it is very hard indeed to reconcile what this chart is telling us with what Highways England are saying in this reply Secondly Highways England make the claim that “There is a roughly equal increase in overall vehicle kilometres in both the Do-something and Do-minimum scenarios compared to the current baseline situation due to forecast traffic growth.” They want to suggest that the scheme does not increase traffic in the area. Quite why they want to suggest this when they have admitted that the scheme will attract traffic into the area I do not know. Here is what HE said in reply to the relevant representation of the PDNPA: (Rep1-042, item RR-0677-1) “The Scheme reduces traffic congestion and delay on the A57 between Glossop and Hattersley. Consequently, it will make both the A57 and the A628 more attractive routes for drivers that are currently using alternative routes to avoid traffic congestion and delay on this section of the A57. Inevitably, therefore, the Scheme is forecast to result in some re-routing of traffic from alternative routes onto the A57 and A628, which means that traffic flows on both roads with the Scheme are forecast to increase. The increases in daily traffic flows on the A57 Snake Road and the A628 Woodhead Road due to the Scheme in 2040 are forecast to be up to 1,450 and 1,100 vehicles respectively</p>	<p>capacity to accommodate additional traffic flows. There cannot be any significant traffic growth along routes already operating at, or close to, capacity. This is the reason that the traffic flows on the M67, A628 and A57 in the 2025 Do-minimum scenario are forecast to be similar to the baseline. The additional traffic demand is instead forecast to find alternative routes, leading to increases in flows on other parts of the road network. In several cases this is forecast to result in large increases in traffic flows on unsuitable or undesirable roads. Whilst the Scheme does not eliminate this forecast problem completely, it substantially alleviates it.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>(Figure 7.6 of 7.4 Transport Assessment Report) (APP-185). This represents approximately a 10% increase in daily flow on the A628 and a 38% increase on the A57 Snake Road” (my emphasis) And, as I said in my comment to the previous reply, traffic on the M67 with the scheme, according to their own model, is predicted to increase substantially, by 7500 vehicles per day. See the first chart above.</p> <p>The scheme DOES increase traffic in the area – at least if we accept Highways England’s model 1. So why do they say it doesn’t?</p> <p>And thirdly, if there is an increase in traffic in the area whether or not the scheme is built, due to forecast traffic growth, as Highways England say in the last sentence of their reply, then why is this increase airbrushed out of this Examination in Public?</p> <p>If the proposer of a scheme such as the one before us were to compare DS traffic flows with a proper baseline, which should be the nearest they can get to “current” flows, then the “increases” would be larger than the ones that they would register if the comparison were made with DM. This would make it more likely that a topic of concern, say Air Quality in a certain location, would be screened in or scoped in for investigation.</p> <p>If on the other hand the opposite were to happen, as in the case of this scheme, then it is more likely that topics get screened out, or scoped out, as not meeting the criterion, which is usually stated as there being a specified increase, in other words a limit value which has to exceeded for the assessment to be thought necessary. It is obvious that with a lower baseline the differences in flows will be bigger.</p> <p>With a baseline which is actual flows now, then all differences in impacts become worse, and also more honest. By choosing to compare Do-Something with an equally hypothetical FUTURE flow called Do-Minimum, the underlying traffic increase is being “vanished” and with it the actual worsening of traffic nuisances which people will experience, and scoping decisions are being skewed in the direction of matters of concern being screened out.</p> <p>I am sure that HE will say – this is how it is done – but as you, Sir, have hinted at in one of your questions, the argument from precedent may be flawed. After all, the job here, under subsection 7 of section 104 of the Planning Act 2008, and repeated in NPS-NN paragraph 1.2, is to evaluate ACTUAL harms against ACTUAL benefits, 2 and not ‘harms artificially reduced – by – biased – guidelines,’ against benefits . . .</p>	
9.70.37	<p>TOPIC 6 – THE ADDITIONAL TRAFFIC ON GLOSSOP’S LOCAL ROAD NETWORK AND ITS IMPACTS</p> <p>DW</p> <p>For example, when writing about “The requirement for the Scheme” in CftS (APP-182) HE say (Para. 3.1.2): “There are many factors that presently reduce journey time reliability these include severe weather; long term traffic growth which will bring some urban sections to their capacity; maintenance on single carriageway sections; accidents; asset condition, including the standard, age and damage to infrastructure; and a lack of technology to assist in the operation of the routes and provide information to travellers” (my emphasis)</p> <p>Or for example, in Chapter 5, the economic case of CftS we read at Para. 5.1.6): “The economic assessment is based on the assignment of a forecast Core Growth Scenario, with alternative sensitivity tests using Low Growth and Optimistic Growth assumptions for the volume of traffic using the Scheme (as aligned with TAG Unit M4 (Forecasting and Uncertainty). The Core Growth Scenario traffic forecast (DW Note: which is the one used by HE, as I understand it, as their main forecast) is based upon what is deemed the most likely land use and traffic growth assumptions for the route” (my emphasis)</p> <p>Or for example, in the TAR, (APP-185) we read, as part of the section on the “Future Baseline” at Para. 4.1.1: “The Do-Minimum modelling undertaken predicts that vehicle flows on the highway links within the study area will continue to increase in a Do-Minimum scenario. Between 2025 and 2040, vehicle flows on all links except for the B6174 are forecast to increase.” (my emphasis) After which TAR gives some examples.</p> <p>Specifically there are plenty of roads with increased traffic. RR-0571 states: “Projections for the proposal indicate substantial increases in traffic and related emissions on the A57 Brookfield (31%), A57 Snake Pass (38%), on minor roads - New Road Tintwistle (50%), Norfolk Rd (21%) and Dinting Rd (45%), and small but significant increases on</p>	<p>National Highways has undertaken a proper assessment of the impacts of the Scheme on pollution, severance, accidents intimidation and bus services. For several of these impacts there are no agreed criteria or thresholds for identifying significant effects and the consequently, the determination of significance can only be based on professional judgement.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>the A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd. All these roads have households living adjacent to them and Dinting Road has a school” This is very hard to reconcile with HE’s claim. REPLY BY HE</p> <p>The impacts of the potential increases in traffic on these roads due to the Scheme have been assessed by National Highways and deemed not to give rise to any adverse effects on road safety or severance sufficient to trigger a requirement for any mitigation. This is on the basis that where there are notable proportional increases in traffic flows, the absolute increases in the number of additional vehicles is relatively low. DW COMMENT ON REPLY</p> <p>I take this reply to refer to the last bullet point in the DW text opposite, that is, to the roads which I cite there: New Road Tintwistle, Norfolk Rd and Dinting Rd, A6016 Primrose Lane, A57 High St East, Shaw Lane and Cemetery Rd. This statement by HE sounds SO anodyne, it is written in the customary bureaucratic grey prose, referring to “mitigation” and soothingly claiming that the increase in the numbers of vehicles is not that great. The truth is far removed from this soothing picture. I have to say, before beginning on this section, that my response to the reply of HE on this point is lengthy but what Highways England have said here is critical to this Examination in Public. Do these adverse impacts of the scheme matter or do they not? Can they just be wished out of existence by a public authority who did not even tell the public about the extra traffic in residential roads in Glossop?</p> <ol style="list-style-type: none"> 1. The view of Highways England is not shared by High Peak Borough Council (HPBC). <p>Here is an extract from their Local Impact Report (LIR):</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 school walking routes and affect shopping habits within the town centre – potentially affecting town centre vitality. This is not considered in the ES.” (Summary Comments of the HPBC LIR, bullet point 8)</p> <p>HPBC are implicitly calling here for a proper assessment to be done of the additional severance and safety issues caused by the projected increase in traffic on minor roads in Glossop. I ask the ExA to instruct HE to fill this gap, and to do this properly, bearing in mind all the matters raised in what follows. (Request to the ExA)</p> <ol style="list-style-type: none"> 2. HE takes refuge in some obsolete guidance <p>This issue of severance etc arising from increased traffic on minor roads in Glossop, and whether it merited investigation arose in the Issues Specific Hearing 2 back in February. The HE spokesperson took refuge in some guidelines issued by the IEMA, as follows: 8.10.2. “59:18 see cake on national highways, it would just point out that the issue (= Institute of) environmental management and assessment guidelines suggest that a threshold of an increase of 30% in traffic to trigger is a significant effect on the road network. So you have in terms of deciding whether mitigation is required. You know that it's a fairly high threshold that is, is the guideline in Environmental Assessment guidelines. And I think the guideline is 30% to 60% is considered A minor adverse impact or 60 to 90% is considered moderate and then over 90 is considered a major adverse impact” 8.10.3. As I have pointed out in my deadline 5 submission, (REP5-040, page 14, footnote 7) these guidelines date back to the Dark Ages and the IEMA acknowledges this because they have called them in for review. So not only are the guidelines clearly inadequate, which I can see just by looking at the above extract from the transcript, but their sponsoring body also believes that they are inadequate. Why then do Highways England hold them up as their guidance in order to avoid doing what they should do.? Do HE not use EIA guidance?</p> <ol style="list-style-type: none"> 3. are the increases in traffic significant or not, and what difference do they make? 	

Response reference:	Representation Issue	National Highways Response at Deadline 7																									
	<p>Let us now look at the actual figures involved, remembering that Highways England are saying in their reply that there is no need to take any action because the increase in numbers of vehicles is in their words "relatively low" See Table below</p> <p>SIDE ROADS IN GLOSSOP DO SOMETHING (DS) versus DO MINIMUM (DM)</p> <table border="1"> <thead> <tr> <th></th> <th>Shaw Lane</th> <th>Dinting Road</th> <th>Cemetery Road</th> <th>Norfolk Street</th> </tr> </thead> <tbody> <tr> <td>2025-DM</td> <td>6900</td> <td>3100</td> <td>5150</td> <td>8200</td> </tr> <tr> <td>2025-DS</td> <td>7900</td> <td>4500</td> <td>5750</td> <td>9900</td> </tr> <tr> <td>percentage increase DS over DM</td> <td>14.5%</td> <td>45.2%</td> <td>11.7%</td> <td>20.7%</td> </tr> <tr> <td>numerical increase DS over DM</td> <td>1000</td> <td>1400</td> <td>600</td> <td>1700</td> </tr> </tbody> </table> <p>Data from ES App. 2.1, tabulated iirc by CPRE DW NOTE: there are many side roads in Glossop NOT included in this table as the data for them has not been collected or modelled, or published, whichever is the case. To call an increase of 1000 vehicles per day on an existing flow of 6900, or an increase of 1400 on an existing flow of 3100 "relatively low" is – well, what is it? Choose your own adjective, and especially do this bearing in mind the implications of these increases (see next paragraph), and the nature of the roads we are talking about. To argue that they effectively make no difference is absurd. People waiting to cross the road, children walking to school and their state of mind as they do so, and their freedom, or lack of it, to enjoy the walk with their friends, the parents or guardians of those children worrying about their safety, and possibly even driving them to school so that their safety can be guaranteed, the intimidation effect of the additional traffic on all those who might adopt or be thinking of adopting active travel, the effect of the additional noise and pollution on people's physical and mental health, the potential impact on local shops and facilities, and the cumulative effect of all this on people's well-being; all this is of no concern to Highways England who declare that no mitigation is required. And as if all that were not enough, HE themselves predict increased accidents along just 2 of these roads to the tune of between £.5 million and £1million in monetised costs, if the scheme were to be built (source: HPBC LIR paragraph 7.33. It should be noted that this information also is nowhere to be found in the TAR. Itn does not feature in the Case for the Scheme either. In fact the CftS goes a step further. Referring to accidents, it states that on "residential roads" the scheme "is not expected to have an impact" . (paragraph 4.5.2). This is perilously close to lying, is it not?</p>		Shaw Lane	Dinting Road	Cemetery Road	Norfolk Street	2025-DM	6900	3100	5150	8200	2025-DS	7900	4500	5750	9900	percentage increase DS over DM	14.5%	45.2%	11.7%	20.7%	numerical increase DS over DM	1000	1400	600	1700	
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9.70.38	<p>4. can these impacts be ignored?</p> <p>HE's failure to look at these issues seriously, or to present any evidence to this Examination in Public (I should emphasize that there is nothing whatsoever about these matters as they affect these minor roads in Glossop in the Transport Assessment Report, which is where these impacts should have been addressed,) is not compliant with subsection 7 of section 104 of the Planning Act 2008, which states that the Secretary of State has to consider whether the adverse effects of the scheme outweigh its benefits. (I have gone into this matter of the Planning Act in full detail in my Written Representation at Deadline 2 REP2- 072)</p>	See previous response above.																									

Response reference:	Representation Issue	National Highways Response at Deadline 7
	Two more things need to be said.	
9.70.39	<p>5 the additional traffic and its associated impacts will be concentrated at certain times of day</p> <p>Highways England give no consideration, in this case or elsewhere (for example when considering severance on the A57 and A628 as those two roads cross the moors) to the fact that the additional traffic will not be evenly spread throughout the day any more than the existing traffic is spread throughout the day. It will quite likely be bunched, exactly like the existing traffic. It is, after all subject to the same underlying factors. I find it surprising that Highways England seem to have a problem with telling us about hourly flows. (I am sure they know what they are, as you cannot design a scheme and its junctions without knowing the degree of bunching. As we all know, there is much more traffic at peak times than at other times. So if you add the additional traffic mostly at the same times, then you get a far larger and more significant effect, at peak times, on all the aspects which I mentioned above.</p>	<p>The assessment of the impacts of the Scheme and the consequential effects has been based on the highest forecast increase in hourly flows across the three modelled peak periods, i.e. the AM, Inter, PM peak periods. It is not based on spreading the forecast increase in traffic flows evenly throughout the day.</p>
9.70.40	<p>6. the effect on accidents</p> <p>As I pointed out in my deadline 5 submission, ((REP5-040, pages 17-20) accidents do not just happen, they have causes and the causes can be identified and addressed. We now know, although we did not know this from the utterly inadequate Transport Assessment Report, that Highways England predict additional accidents on Shaw Lane and Dinting Road. God bless the children who are going to be knocked over.</p>	<p>The overall impact of the Scheme on road safety should be considered, since all road schemes of the type proposed are likely to result in a redistribution of traffic, with increases on some roads and decreases on others. Consequently, all road schemes are likely to result in an increase in road accidents on some roads and reductions on others. Overall, the Scheme is forecast to result in a 0.3% increase in accidents over 60 years, which is not considered to be significant.</p>
9.70.40	<p>Conclusion of this section</p> <p>In the light of what I say about the stipulations of the Planning Act in paragraph 4 of this section, I repeat: there must be a proper assessment of the additional severance, safety, and other issues caused by the projected increase in traffic on minor roads in Glossop. Will you ask the applicant to carry out this assessment? (Request to the ExA)</p>	<p>No response required.</p>
9.70.42	<p>TOPIC 7 – MORE ON THE MODEL, IN PARTICULAR THE STATUS OF THE DfT 2019 FIGURES</p> <p>DW</p> <p>Be that as it may, there is something not quite right here. There are 2 versions of what is going to happen, and they both cannot be right. I am tempted to do some wondering about why this should be so. But it is enough to say to you that this inconsistency should not be allowed to stand and needs to be cleared up.</p> <p>REPLY BY HE</p> <p>It is acknowledged there is a difference in the Department for Transport (DfT) daily count data and the base year modelled flow. The DfT counts themselves are not used as part of the traffic model build in part because the "observed" traffic flows as stated by DfT are often extrapolated estimates from previous counts where they were not counted in that specific year. Separately commissioned traffic counts were used to develop the traffic model as part of the model calibration process. These are considered more representative than the DfT counts. It should be noted that modelled traffic flows are based on average hourly flows by time period (AM, PM and interpeak) rather than the daily flow, hence there is scope for greater differences to develop between modelled flows and the DfT count data when factored to a full day.</p> <p>DW COMMENT ON REPLY</p>	<p>Traffic demand is forecast to increase regardless of whether this Scheme is implemented. This additional traffic demand will result in increased traffic flows across the modelled road network, but the distribution of the additional traffic across the road network will vary depending on where there is and where there isn't reserve capacity to accommodate additional traffic flows. There cannot be any significant traffic growth along routes already operating at, or close to, capacity. This is the reason that the traffic flows on the M67, A628 and A57 in the 2025 Do-minimum scenario are forecast to be similar to the baseline.</p> <p>The additional traffic demand is instead forecast to find alternative routes, leading to increases in flows on other parts of the road network. In several cases this is forecast to result in large increases in traffic flows on unsuitable or undesirable roads. Whilst the Scheme does not eliminate this forecast problem completely, it substantially alleviates it.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>As I now have made clear in my presentation with bar charts of the predicted flows with or without the scheme (REP5-039), the point at issue is principally the fact that HE's modelled flows on the M67 link for 2025 Do-Minimum are the same as their 2015 modelled flows, and this is simply not credible. If we look at the bar chart below (slide 14),</p>	
9.70.43	<p>A6013 would not necessarily result in a change in flow on the A6013 through Bamford. The traffic modelling used to assess the Scheme indicates that the traffic flows on the A6013 through Bamford are forecast to marginally reduce in 2025 (by - 1%), but marginally increase in 2040 (by 1.6%) compared to without the Scheme. These forecast changes in flow are not considered to be significant. The evaluation of changes in the forecast number of accidents on the affected road network due to the Scheme covers 60 years. Consequently, the small forecast increase in traffic flows on the A6013 through Bamford from 2040 results in a correspondingly marginal increase in the forecast number of accidents on the A6013. DW COMMENT ON REPLY</p> <p>Figure 7.8 in the TAR tells us that accidents of a monetised cost of between £2million and 1.5million will occur on the A6013 through Bamford if the scheme is built. Or maybe the number is quite different as it is impossible to tell from the map shown on my screen, as HE have used colours which are illegible. If it is true as they say that traffic flows and accidents are directly correlated, then these increasing numbers of accidents on the road through the village of Bamford indicate an increase in traffic. This in turn raises a legal issue since there has been no assessment of impacts of this scheme on what is a conservation area, and I believe that this is a legal requirement. This still leaves the fact, not addressed by HE in their reply, that a drop in traffic through Bamford whilst the traffic increases by 38% on Snake Pass is implausible. Maybe there is an explanation, but HE have not said what it is.</p>	<p>Please refer to National Highways' response to the Examining Authority's Second Written Question 3.14 (REP6-017).</p>
9.70.44	<p>TOPIC 9 – WHY IS AN INCREASE IN TRAFFIC OF 38% IN THE PEAK PARK LABELLED A “SLIGHT INCREASE” DW</p> <p>How can we explain this? Well, PDNPA have also noticed this. At Paragraph 8.4.6 of their LIR, we read: “8.4.6 The percentage increase in flow on the A57 Snake Pass in 2025 with the scheme seems to be very large (37.7%) but the Environmental Statement (Table 7.32) only notes a ‘slight increase’ of traffic on the A57 (e.g. in relation to VP23) with no change to the Special Qualities of the National Park. We are concerned that the assessment of impact of increased traffic on the A57 is underestimated.” So here we see repeated, by the PDNPA, this same concern – namely that the increase (meaning DS-DM) is 38% and yet the ES calls this a “slight increase” This makes me wonder if there are not 2 different figures in play here, that underlying this discrepancy lies an error of some kind. The alternative is that the ES is being disingenuous. In this case I prefer the former explanation (in the technical sense of – “I think it is more likely” – but please can the ExA find out what is going on here? HE REPLY</p> <p>Although the increase in traffic due to the Scheme on the A57 Snake Road/Pass is forecast to represent up to a 38% increase, the absolute increase in the number of additional vehicles is relatively small at approximately up to 1,450 vehicles per day, which is equivalent to approximately an average of 2 to 3 vehicles per minute in each direction. It is on this basis that the forecast increase in traffic on the A57 is not deemed to be significant in terms of perception because of the already high number of vehicles using the route. DW COMMENT ON REPLY</p> <p>Same comments as above, concerning the “relatively low” increases in traffic on the residential roads of Glossop. Namely, if you add the additional traffic mostly at the same times (as existing traffic), then you get a far larger and</p>	<p>The number of additional vehicles per minute quoted by National Highways is derived from the biggest forecast increase in hourly flows during any of the three peak periods modelled, i.e. AM, Inter and PM peak three hour periods.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>more significant effect, at peak times, whatever that effect might be. In the Peak Park, it will be everything from the removal of tranquillity to impacts on wildlife.</p> <p>The “average of 2 to 3 vehicles per minute” will be something completely different at peak times. Of course peak times on Snake will not be the same as peak times in Glossop. They may well be 3.00pm on a Sunday afternoon. HE also pull this trick of “small increase” with respect to Tintwistle – effectively saying: ‘it is already so bad, that a little more won’t hurt.’ (I am sorry I cannot find the exact wording because the documents in the Examination library cannot be searched – and yes, I have pointed this out to your admin team. I think it was in a reply to PDNPA).</p> <p>I also note that 4000 vehicles per day is now a “high” number. I look forward to seeing HE apply this new insight to other areas, such as Glossop. And what does that make the 10,000 or so on an average day on the A628 through Tintwistle? An intolerably high number perhaps?</p>	
9.70.45	<p>TOPIC 10 – IMPACT OF INCREASED TRAFFIC IN GLOSSOP AND ELSEWHERE ON BUS SERVICES</p> <p>DW</p> <p>Impact of this issue on bus services</p> <p>Considering the impact of the scheme on local bus services brings home how important this issue of the generalised traffic burden on the area as a whole is (not to mention the whole issue of traffic nuisances). HE writes this in reply to question 3.14 about the impact of the scheme on bus journey times: (another screenshot, copying not possible) Firstly, Figure 3.5 on page 28 of the TAR shows bus routes in the area – the associated text gives more details. Secondly, HE says in this reply that no study has been undertaken and yet the TAR says at Para. 3.4.11 also on page 28: “It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion</p> <p>Thirdly, putting the above two statements together reveal that there is no basis for HE’s claim beyond them asserting it to be so. And yet the means exist for all participants in this EiP including, indirectly the public in its widest sense, to get a clear picture of these issues (subject to any questioning of the correctness of the predictions as a whole),</p> <p>This is so important. Please can you, the ExA ask HE to publish a series of clear maps showing the traffic flows which they are predicting with and without the scheme, throughout the area, in the opening and design years, and also with the “current” flows, so that we all know what assertions about pollution, severance, and bus services sticking to time, are reasonable and which are not???</p> <p>HE REPLY</p> <p>The traffic modelling enables National Highways to predict that the journey times and service reliability for some bus services will improve with the Scheme because of the reduction in traffic congestion and delay on A57 through Mottram in Longdendale, whilst for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop.</p> <p>Bus services have not been modelled separately because bus services in the area are relatively infrequent and changes to bus journey times are capable of being estimated from the traffic modelling. As bus services are relatively infrequent, bus passenger numbers are very small in comparison to the overall number of vehicles using the affected road network. Consequently, the effects of changes in bus journey times do not materially alter the assessment of the benefits of the Scheme.</p> <p>DW COMMENT ON REPLY</p> <p>HE write in their reply here: “for other bus services there may be a deterioration in journey times and service reliability due to increased traffic flows on some roads due to the Scheme, e.g. in Glossop.”</p>	<p>Please refer to National Highways’ response to the Examining Authority’s Second Written Question 3.14 (REP6-017).</p> <p>Also see Derbyshire County Council’s response 3.18 to the Examining Authority’s Second Written Questions (REP6-026)</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>The TAR says at Para. 3.4.11: “It is expected that bus services running through the study area will benefit from improved journey times and reduced congestion” It appears that statements made in the TAR, which has been prepared by HE for this Examination, are not worth the paper they are written on. I am being frank, and wait with interest to hear from HE as to how these two statements can be reconciled. And there is the dazzling throwaway line showing that HE are not living in 2022. There are not that many passengers because there are not that many bus services. And so the negative impact of the scheme on bus journey times does not make a lot of difference to the VfM of our scheme. Which is the very scheme which is elbowing out the elephant in the room which is a modern, climate-compatible transport solution for the area.</p>	
9.70.46	<p>TOPIC 11 – ACCIDENT RATES AND TRAFFIC FLOWS RECAP</p> <p>DW</p> <p>TRAFFIC DATA - DATA NON GRATA – THE GLOSSOP QUESTION – (see screenshot on page 12 of original submission) HPBC and DCC both put in a holding objection because of inadequate information, which did not allow them to understand the scheme and its impacts. Accident levels seem to show that taken as a whole the network has more traffic, as this extract from the BBA documents shows, page 50, Para. 5.4.3 “5.4.3 A more detailed analysis of impacts across the network shows that the A57 Snake Pass, which is known to have a high accident rate, is forecast to experience an increase of more than 160 accidents. This alone exceeds the total impact across the rest of the network combined. Small increases in accidents are also expected through Glossop and along the A628. The scheme does not make any of these roads intrinsically less safe but increases traffic flow, leading to a higher potential for accidents to occur. Flow is reduced elsewhere on the network, such as along the M62, but motorways are safer than other road types and so the net impact of the combined rerouting is negative.” (my emphasis). My comment: if the “total vehicle kilometres” was genuinely the same with and without the scheme, then according to the technical people the accident level would also remain the same. HE REPLY</p> <p>The accident risk varies by type of road, so if the distribution of traffic changes across a road network it does not mean that the overall accident risk remains the same even if the total vehicle kilometres remain unchanged. This is because the proportion of traffic using different types of roads with either higher or lower accident risk levels may change. The forecast increase in accidents due to the Scheme over 60 years represents only a 0.3% increase overall across the affected road network compared to the Do-minimum scenario, which is considered marginal. To some degree this reflects the fact that the Scheme is not forecast to result in an overall increase in total vehicle kilometres. DW COMMENT ON REPLY</p> <p>I can see that the new road, with its vastly better safety profile, will add to the number of relatively “safe” vehicle kilometres and thus serve to have a downward effect on accident rates. That does NOT mean that accident rates will necessarily be lower overall, in fact they are not. However, that is no reason for HE to try once again to make us think that total traffic in the area will be the same with the scheme as without. It won’t. Their technical Papers tell us so: as I cite in my original statement here: “The scheme does not make any of these roads intrinsically less safe but increases traffic flow,” (BBA paragraph 5.4.3, my emphasis) Traffic on the M67, if the scheme is built, according to their own model, is predicted to increase substantially, by 7500 vehicles per day. See the first chart in this document. This traffic has to go, or come from, somewhere, which means that there will be more traffic in the area. Unless there is a giant car park under the roundabout at the Eastern end of the M67 where all these trips begin and end. □</p>	National Highways has nothing further to add to this point.

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>The scheme DOES increase traffic in the area – at least if we accept what Highways England’s model is telling us. 3. So why do they repeat this phrase about total kilometres which makes us think that it doesn’t? And thirdly, if there is an increase in traffic in the area whether or not the scheme is built, due to forecast traffic growth, as Highways England say in the last sentence of their reply, then why is this increase airbrushed out of this Examination in Public, as that increase itself will lead to an increase in total kilometres and therefore in accidents?</p>	
9.70.47	<p>TOPIC 12 – SCREENING OUT DECISIONS AND THE NEED FOR COMPARISONS WITH THE BASELINE</p> <p>DW</p> <p>TRAFFIC DATA - SCOPING OUT DUE TO TRAFFIC “INCREASE NOT BEING GREAT ENOUGH”</p> <p>I put it to you, the ExA, that this is simply not satisfactory. I think I know what the answer of HE would be if you were to ask them the question, namely whether my suggestion would not give a more accurate picture, to the public – meaning everyone – and would not better guide the decision as to whether an assessment is necessary for x, y, or z. I think they would say that they are following their guidelines, in this case, I believe that is in the DMRB (but I may have gathered that wrongly, and maybe it is enshrined in more than one guidance document). To which I would reply that in that case there is a problem with the guidance, and I can only plead with you, the ExA to deal with that fact appropriately. To sum up, the guidance is designed in such a way that the public is badly informed, and even one could argue, misled and that is unsatisfactory, and non-compliant with principles of good governance, such as Nolan. Please will you ask the question above, or preferable by far, simply instruct HE to place before this examination the requisite comparisons, in chart, and in map form.</p> <p><i>HE REPLY</i></p> <p>Screening out small changes in traffic flows from an impact assessment is industry standard best practice. The purpose of the assessment is to establish the impacts and consequential effects of the Scheme and isolate these from the impacts due to forecast traffic growth that would happen without the Scheme in any event. This is achieved by comparing the Do-something with the Do-minimum scenario. The purpose of the assessment isn’t to assess the impacts and consequential effects due to forecast traffic growth that is forecast to happen with or without the Scheme, i.e. comparing either the Do-something or Do-minimum scenarios with the baseline.</p> <p><i>DW COMMENT ON REPLY</i></p> <p>HE’s reply is fine as far as it goes, and in fact is very plausible, But buried within it is a massive methodological flaw. If we do not remedy this flaw then the whole EiP risks barking up the wrong tree and coming up with the wrong answer.</p> <p>HE have not included what “my suggestion” in line 2 above actually was, in the original document to which they are replying (REP3-032). I will remedy this, so that readers can understand the important principle which</p>	<p>National Highways accepts that an assessment of the Do-minimum or the Do-something scenarios against the baseline would give rise to different and potentially worse impacts and consequential effects. However, these would be due to increases in traffic demand currently forecast by the Department of Transport (DfT) and not those due to the Scheme. The impacts and consequential effect of the Scheme, as separate to those due to forecast increases in traffic demand, can only be assessed by comparing the Do-something with the Do-minimum.</p>

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	<p>is at stake here.</p> <p>My suggestion was that future predicted traffic flows and their impacts should be compared not only to other future flows (as in comparing DS and DM) but also to actual flows as they are now, which is what the person in the street actually experiences on a day to day basis. The rationale for this I gave as follows:</p> <p><i>What they (HE) do <u>not</u> do is compare the DS figures (or indeed the DM figures) with the BASELINE. If they were to do this then the increase in impacts would look worse, or even far worse. We do not know what the true increase is and therefore cannot accurately assess the potential increase in the negative impacts.</i></p> <p><i>The scheme's proposers first ASSUME a given level of traffic growth. This is no doubt (though I would not know as I was not given this information when I requested it) included in the traffic model and predictions. But then it is "disappeared" from consideration, and we just get, all the time, DS vs. DM, thus obscuring the issue of the background growth, which is <u>itself</u> problematic,</i></p> <p><i>The underlying growth in traffic is rendered invisible, and not present to the mind of the reader. This blind spot runs right through the examination, or rather through the presentation of the figures by HE.</i></p> <p>And, I would add, not only does this omission of consideration of the baseline reduce the amount of adverse effects which we are talking about, it also makes traffic growth look <i>inevitable</i>, rather than something which is in fact <i>highly malleable</i> and could be lowered by effective local measures, as the government is now calling for.</p> <p>Again, I would insist that according to the Planning Act 2008, the ExA is tasked with comparing adverse effects of the scheme against benefits. Once you are using that frame of reference, can you in all conscience recommend the scheme, if an alternative package actually delivers a far better benefits to adverse effects ratio than the scheme?</p>	
9.70.48	<p>THEME 2 –THE DOCUMENTS OF BBA RELEASED BY CPRE TO THE EXAMINATION</p> <p>My observations on this bundle of documents will be under the following headings:</p> <p>A single track methodology</p> <p>The uncertainties list</p> <p>Climate change</p> <p>The policy environment</p> <p>BCR's</p> <p>Switch of consultants</p>	<p>National Highways has provided additional information as and when requested by interested parties.</p>

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>A few preliminary remarks</p> <p>Firstly, a word of gratitude is due to CPRE for submitting these documents to the examination. And secondly, I do think that a word of reproach and puzzlement should go to Highways England for not submitting this documentation for scrutiny at this examination or as soon as it was prepared. I note from the document themselves that the economic appraisal package is dated 26//07/2021 and two of the other documents are dated 12 / 11 / 2021 and that one document is undated. I must say that I have to assume that the vast majority of this work was done well before November.</p> <p><i>HE REPLY</i></p> <p>It is not normally appropriate to release partial information into the public domain in advance of the full package of information being submitted with the Development Consent Order application. This is because partial information would potentially be misleading or misunderstood in the absence of all the supporting information for the Scheme that enables full comprehension of all aspects of the Scheme assessment in combination.</p> <p>DW COMMENT ON REPLY</p> <p><i>effect on scrutiny</i></p> <p>By not releasing the technical documentation in a timely fashion, HE made it far more difficult, if not impossible for other stakeholders to peer review, or to arrange for peer review of the modelling. They put <i>everyone else</i> under time pressure. If it is some sort of “standard practice” to withhold information of this type then maybe standard practice needs to change.</p> <p>The suggestion that issuing 790 pages of technical support documentation for the modelling could “potentially be misleading or misunderstood” is laughable, particularly when that documentation is being sought by a professional transport planner with years of experience or by a County Council.</p>	
9.70.49	<p>HE as the purveyors of full and complete information</p> <p>Well, I never. Here we see that HE’s goal is to “[enable] full comprehension of all aspects of the Scheme assessment in combination.” This from the authors of a TAR which is so bad as to be unacceptable.</p> <p>On Accidents, Alternatives, Buses, Climate change, Glossop, HGV’s, Journey times, Reliability, Severance and Trains necessary information is simply missing, the presentation of what is included is highly selective, and assessment is conspicuous by its absence. How such a document can be presented to an EIP I do not understand.</p> <p>I will not go into the detail of this document here, it is all to be found in my detailed 17 page critique in my Deadline 5 submission: Library REP5-040, pages 16-33.</p>	<p>Please refer to National Highways’ comments on Daniel Wimberley’s Deadline 4 submission.</p>

8. REP6-035 Jeff Brown comments on the Proposed Development

Response reference:	Representation Issue	National Highways Response at Deadline 7
9.70.5	<p>Previous work by Highways England in 2007 identified a risk to properties in the vicinity of the Mottram underpass tunnel and relevant documents are referenced on page 8 (ref 5,6,7,8,9)</p> <p>There was a risk of settlement both short term during construction, and longer-term post construction as a result of the dewatering of the Mottram.</p> <p>Within the document it states: “4.5.11. Permanent changes in groundwater levels can also be associated with ground settlement. Settlement assessment will be carried out during detailed design based on the outputs of groundwater modelling as detailed in Chapter 9 of this ES.”</p> <p>As a resident of a property nearby to the cutting of the tunnel (underpass) I would like to know why such detailed modelling work cannot be completed up front, before the go ahead – its not like HE/HA haven’t had the time to do this since the original reports over a decade ago.</p> <p>I think it would be reasonable to know, in advance what the potential settlement effects may be with some confidence in the level of quantitation and how the applicant would monitor and address any damage – both short and longer term.</p> <p>Is the applicant prepared to underwrite any damage caused by the dewatering – do they have funding for this?</p>	<p>Following the completion of the latest ground investigation, groundwater modelling is currently ongoing as part of the detailed design process for the Scheme. This assessment will be completed prior to any works being undertaken for the construction of the Mottram Underpass.</p> <p>Before any construction activity which may affect ground movement around adjacent properties commences it is proposed to survey properties in the area which may be affected due to settlement to ascertain following construction whether properties have been damaged by construction activity. In addition to surveys of properties, survey stations will be installed in the area to monitor movement both horizontally and vertically, locations of these will be determined following the completion of the detailed design.</p>
9.70.51	<p>Fresh Water Well</p> <p>Secondly, our home enjoys the use of a water well in the garden. When we moved here in 1999 the well was the sole source of water and it had been used since the property was built in 1738. The well is listed in the deeds of our property. In addition, (although not in place at the moment) we have a legal obligation to provide water from our well to our neighbour at “Dial Cottage”.</p> <p>Although we have provided this information to the applicant, we do not know what they intend to do about it if the well dries up. Should the dewatering of Mottram cause the well to dry out – what obligations do the applicant have in this respect?</p>	<p>A Water Features Survey for the Scheme was completed in 2019. This Survey involved visits to all properties known to have private abstractions within 1 km of the Scheme’s Draft Order Limits. A desk study update to this Survey, that included the latest data from the Tameside Metropolitan Borough Council private abstractor register, was completed in 2020. The results were included in Environmental Statement (ES) Chapter 9: Geology and Soils (APP-065) and Chapter 13: Road Drainage and the Water Environment (REP5-011) submitted at Deadline 5.</p> <p>Potential impacts due to dewatering on identified receptors have been assessed in Appendix 13.2 Hydrogeological Risk Assessment of the ES (REP3-025) and quantified using a groundwater model. Drawdown impacts on groundwater receptors, including current private abstractions identified within 1 km of the Scheme, are summarised in Tables 4.4 and 4.5.</p> <p>The water well located at the property neighbouring Dial Cottage is not listed on Tameside Metropolitan Borough Council private abstractor register and therefore has not been specifically assessed for quantitative drawdown impacts in the Hydrogeological Risk Assessment. However, the modelling completed does cover the property and indicates that post-construction, long-term groundwater drawdown at this location will be between 3.5 and 4 m below pre-scheme levels.</p> <p>The depth of this water well is not known, however there is a risk that this level of drawdown will cause the water well to dry out. In such a scenario the applicant will assess how an alternative source of water can be secured, along with any appropriate compensation.</p>
9.70.52	<p>Old Hall Lane Site Visit and Mottram Showground</p> <p>Finally, I noticed there was some recent correspondence regarding a site visit to the Eastern portal of the Mottram underpass (requested by CPRE). I really would hope that the examiner can take some time to walk along Old Hall Lane and witness the rural character of the area. I believe that the proposed bypass would have a massive detrimental effect on this part of Mottram as a result of the new traffic noise, pollution and resulting loss of green space. Given the volume of traffic it seems likely that the Mottram underpass will become choked with the same crawling traffic that chokes Mottram Moor.</p>	

Response reference:	Representation Issue	National Highways Response at Deadline 7
	<p>During any site visit, please go through the open gate (top of coach road) into the fields adjacent to Mottram Showground and then walk around the former showground and around the small pond (which will be lost). Please note that this green belt land is often used by local people for recreation – typically dog walking across the pastures when there are no sheep in the fields. I would guess that 10 or 20 people a day are enjoying the green space adjacent to Old Hall Lane as well as the wooded area with mature trees and it is a great shame to lose such amenity when there is no clear benefit from the proposed road scheme! We would be very happy to accompany the examiners if they carry out a visit.</p>	

9. REP6-036 Keith and Jane Bassham comments in support of submissions from Sharefirst My Journey to School and on the Proposed Development

Response reference:	Representation Issue	National highways Response at Deadline 7
9.70.53	<p>Although our own children are no longer of school age, we are able to observe local pupils from both the primary and secondary sectors on their way to and from their schools. We live next to Sheffield Road, which is part of the A57, and often walk or drive into Glossop. There are many children and young people who walk along Sheffield Road towards their schools; in the case of primary school children they are usually accompanied by parents or other responsible adults. The air quality along the A57 at busy times suffers from the effects of congested traffic and a significant number of heavy goods vehicles whose drivers choose to use the Snake Road route to and from Sheffield.</p> <p>We understand that modelling exercises have predicted the completion of the proposed link roads will lead to an increase in the traffic going through Glossop and a consequent further degradation in air quality as pollution might be expected to increase by as much as 50%. This is clearly a matter of concern as it would adversely affect the health of all pedestrians, including those on their way to and from school. We think ExA should consider listening to the traffic and air quality experiences of school pupils who walk along the main road. Perhaps one of your inspectors could ask to visit local secondary schools and talk about these concerns with sixth-form students, for example?</p> <p>There is presently an opportunity to establish some base measurements of air quality because the Snake Road section of the A57 is closed for repairs. We suggest that the ExA undertakes such measurements now, differentiated by geographical location through Glossop and by time of day, to establish a base line against which to compare similar measurements made once the Snake Road is</p>	<p>The Environmental statement chapter 5 air quality [REP3-006] presents results of air quality modelling without and with the Scheme in appendix 5.5 [APP-159]. The comparison of modelled concentrations with the Scheme and without the Scheme in the opening year of 2025, does not indicate that there would be a 50% increase in concentrations at any location. The maximum increase in concentrations at human health receptors is 2 µg/m³, which is considered a “small increase”.</p> <p>A baseline air quality monitoring survey for nitrogen dioxide has been undertaken by National Highways between summer 2018 until the end of 2021. The results of the survey from 2018 to 2020 are presented in Environmental Statement appendix 5.4 [APP-159]. This survey was undertaken to supplement ongoing local authority air quality monitoring surveys.</p>

10. REP6-038 Tim Nicholson on behalf of Peak District National Parks Authority response to the Examining Authority's Second Written Questions

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
9.70.54	3.5	<p>The Design Manual for Roads and Bridges (DMRB) provides screening criteria for traffic flows which are used to decide whether a detailed assessment is required with particular reference to biodiversity, noise, air quality, and in relation to the effects on the Peak District National Park.</p> <p>e) Please provide, for each relevant environmental topic, the screening threshold set out in the DMRB, providing the relevant paragraph reference in each case.</p> <p>f) Please identify any other recognised screening criteria (Institute of Environmental Management and Assessment (IEMA), Institute of Air Quality Management (IAQM), etc) that have been used or considered, providing the relevant paragraph reference in each case.</p> <p>g) Where there is a choice of DMRB or other screening criteria, please identify the criteria selected and the reasoning for that choice.</p> <p>Do the local authorities, Peak District National Park Authority and Natural England have any comments that they wish to make about this matter?</p>	<p>We recognise the guidance from DMRB for the setting of the Assessed Road Network. We also appreciate the advice offered to the Issue Specific Hearing 2 by the applicant thus far on the limitations for robust modelling where changes are less than 1,000 vehicles.</p> <p>However, given the small difference between the predicted AADT for the A628 in 2025 under the 'Do Something' scenario of 40 vehicles (4%), we would have preferred Highways England / National Highways and their agents to have adopted a precautionary approach. Assessing the route on the basis of a 1,000-vehicle increase would have allowed for a detailed consideration of the effects of the scheme on biodiversity, noise, air quality, and in relation to the effects on the Peak District National Park. We appreciate that on the basis of the predicted 960 vehicle increase (AADT 2025 Do Something) an assessment of 1,000 vehicles would probably have shown the worst-case scenario, but this could have been caveated with regard to the modelled figures and the minimum increase in flow requirements for accurate modelling.</p> <p>Given the apparent small difference between existing recorded flows and the predicted traffic flows for 2025 (both of which are based on the pre-Covid situation), it has been suggested within the Examination by some parties that the modelled figures are lower than would be expected with the scheme. Therefore, a precautionary approach would again appear to have been the best way to take; particularly given the high level of protection ascribed both to the National Park and its internationally designated sites along the A628 corridor.</p>	<p>Please refer to National Highways' response to question 3.5 and 7.5 of the Examining Authority's Second Written Questions (REP6-017).</p> <p>Please also refer to National Highways' comments on the National Trust's response to the first Written Questions (page 14 and 15, REP3-021) which sets out National Highways' position regarding the potential impact of the Scheme on nitrogen deposition within the designated sites adjacent to the A628. Given the distance of the boundaries of the designated sites relative to the A628 road edge, any impact would be expected to be less than that assessed within the designated sites which are immediately adjacent to the A57 Snake Pass. As such there is not expected to be a significant effect on the designated habitats within sites adjacent to the A628.</p> <p>Human health receptors within Tintwistle AQMA and ecological receptors within the internationally designated sites adjacent to the A628 are considered as sensitive receptors within National Highways' DMRB LA 105 guidance and would be assessed as such regardless of the national park status.</p>
9.70.55	3.7	<p>Please confirm whether, or not, the Authority is satisfied with the Applicant's explanation regarding confidence in traffic increase figures / screening out of effects on the A628 [REP3-028].</p>	<p>The applicant's Rep [REP3-028] does not appear to obviously explain their confidence in traffic increase figures / screening out of effects; although there is reference to their assessment of noise issues including a table of predicted traffic flows during the time period 06:00 to midnight in response to the Local Impact Report submitted by Peak District National Park Authority.</p> <p>Nonetheless, the applicant has set out at the Issue Specific Hearing 2 the limitations for robust modelling where changes are less than 1,000 vehicles. Whilst we are confident that the applicant is confident in the modelled figures, we are still concerned at the screening criteria used, given the high level of protection ascribed both to the National Park and its internationally designated sites along the A628 corridor.</p>	<p>Please refer to National Highways' response to question 3.5 above.</p> <p>Regarding consideration of the impact of Covid-19 on forecast traffic demand, please see National Highways' comment RR-0240-23 on Derbyshire County Council and High Peak Borough Council Relevant Representation (REP1-042).</p>

Response reference:	Question number	Examining Authority Second Written Questions	IP Response	National Highways Response at Deadline 7
			<p>It is also worth noting that the modelling is based on pre-Covid levels of travel and prior to a national declaration of the Climate Emergency. At the current time it is unclear how reflective of the 'new normal' the modelled figures are.</p>	
9.70.56	3.11	<p>There are concerns that traffic flow over the Snake Pass will be increased by route transference and will result in additional accidents. Derbyshire County Council have identified a possible solution to control vehicle speeds on this route to address this issue. This would involve the introduction of average speed cameras.</p> <p>a) Do you consider such a solution would provide a practicable and effective solution to vehicle speed management on the A57 Snake Pass?</p> <p>b) If not, why not?</p> <p>Do you have any suggestions for acceptable physical measures on the A57 Snake Pass to address highway safety?</p>	<p>a) Average speed cameras have proved effective in controlling speed on a number of roads nationally. However, notwithstanding our concerns in relation to road safety (expressed within our previous representations), we do not believe this to be an appropriate solution to address the issues. We are concerned that the proposed response to address the indirect road safety concerns of induced traffic flow (resulting in a range of negative impacts on the special qualities of the National Park); is to seek to deliver a scheme that leads to even greater physical impact on the National Park, it's landscape and its setting.</p> <p>This is one of the issues with the information submitted as part of the assessment; the 'knock on' effects of increased traffic flow are not considered. In this case, addressing the indirect effects, (increased traffic flows and worsening road safety as a result of the scheme) may result in direct and substantial effects on the National Park landscape – in this particular case, average speed cameras and all of the associated signage and other infrastructure.</p> <p>We believe that it is for the applicant to (a) consider these aspects in their assessment and (b) look to reduce potential effects or include mitigation/offset/compensation measures. Overall, we do not consider such a solution would provide a practicable and effective solution to vehicle speed management on the A57 Snake Pass.</p> <p>b) There is an existing average speed camera scheme within the Peak District National Park. The scheme covers the A54 and A537 roads within the South West Peak area of the National Park. The scheme was introduced with the agreement of the National Park Authority due to the ongoing and severe road safety issues associated with the route during the early years of this century. Predominantly, the issues were related to the use of the route by leisure motorcyclists and had resulted in the 'Cat and Fiddle' route being described and consistently rated as the most dangerous road in the country (EuroRAP).</p> <p>The scheme has been in place for 10 years and there is now a requirement to update the infrastructure including the provision of additional cabinets at each camera location to ensure passive safety for road users in the event of any collision with the cameras.</p>	<p>The Snake Pass sits outside the DCO application boundary. Average speed cameras are not part of the A57 Link Road Scheme. National Highways is aware and the PDNPA has confirmed that there are existing average speed cameras within the PDNPA area. National Highways is also aware that Derbyshire County Council has been successful in a bid via the Safer Roads Funds to develop a scheme consisting of average speed cameras along two routes that are within the Peak District National Park.</p> <ul style="list-style-type: none"> • A5004 Buxton to Whalley Bridge “Long Hill” – average speed cameras for a 50mph speed limit • A5012 Cromford to Newhaven – average speed cameras <p>The two schemes have secured funding for both design and installation subject to consultation with their stakeholders and the public regarding the implementation of the scheme, with a programme for delivery to be with the next three years.</p>

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			<p>The scheme itself is visually intrusive within the landscape and along with the associated signage has an urbanising effect on what is an open moorland landscape. Photos provided at Appendix 1 show the existing scheme at various locations within the National Park across the A537 and A54 corridors. It should be noted that for the new scheme, additional cabinets will be provided, the cameras will be pole rather than gantry mounted and an infra-red array will be attached to each pole. The Peak District National Park Authority adopted a Transport Design Guide Supplementary Planning Document in 2019. This document includes a section on Enforcement Cameras. Paragraph 14.16 states: -</p> <p><i>“Whilst recognising the traffic calming effects of average speed camera schemes, the Authority is also concerned about the visual intrusion of such schemes. Given the visual impact that average speed cameras (and their associated infrastructure) have on the setting of the National Park; the Authority’s preferred approach would be to utilise other measures as discussed above, to address the enforcement of speeding vehicles. The delivery of further average speed camera schemes should only be considered in extremis, and may be opposed by the Authority without sufficient evidence to support their introduction.”</i></p> <p>c) The nature of the Snake Pass means that whilst it might be seen as a strategic link between Sheffield and Manchester, in reality its topography means that it is a challenging route for HGV traffic. Where HGV traffic slows other vehicles, it can lead to accidents caused by frustration experienced by other motor vehicle users. These are effectively caused by motorists trying to overtake HGVs and other slower moving vehicles on a road consisting of numerous bends with short straighter sections. The introduction of a 7.5 tonne weight limit might help to address this issue.</p> <p>However, it is worth noting that the recent closure of the A57 Snake Pass due to landslips has again demonstrated the overall instability of the route. Whilst this instability is a function of the geology of the area and not necessarily related to the number of vehicles, it would appear inadvisable to rely on it as a strategic route. Anecdotally the road has undergone a number of landslip related closures or traffic management schemes over recent years, often related to severe weather events (freeze / thaw and dry summers followed by very wet winters).</p> <p>It has also been apparent that owing to the recent closures the route has become a considerable attraction to walkers and cyclists taking advantage of the lack of other vehicles. This could present an opportunity to close the summit of the Snake</p>	

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			<p>Pass to through traffic, allowing access from both sides but not for through journeys. It would also lessen the demand on Derbyshire County Council to maintain the route beyond that required for local and visitor traffic.</p>	
9.70.57	3.12	<p>Similarly there are concerns that traffic flow over the Woodhead Pass will be increased by route transference and result in additional accidents. Derbyshire County Council have identified a possible solution to control vehicle speeds on this route to address this issue. This would involve the introduction of average speed cameras.</p> <p>a) Do you consider such a solution would provide a practicable and effective solution to vehicle speed management on the A628 Woodhead Pass?</p> <p>b) If not, why not?</p> <p>Do you have any suggestions for acceptable physical measures on the A628 Woodhead Pass to address highway safety?</p>	<p>a) Notwithstanding our concerns in relation to road safety (expressed within our previous representations), we do not believe this to be an appropriate solution to address the issues. We are concerned that the proposed response to address the indirect road safety concerns of induced traffic flow (resulting in a range of negative impacts on the special qualities of the National Park); is to seek to deliver a scheme that leads to even greater physical impact on the National Park, it's landscape and its setting.</p> <p>The Environmental Statement coupled with information provided as part of the hearings indicates that the applicant does not believe that the predicted increase in traffic is sufficient to require an assessment of impacts on the special qualities of the National Park. We believe that any assessment of the need for an average speed camera scheme to offset the impact of induced traffic flows on the applicant's network should form part of the scheme as a whole, rather than as an afterthought. It should be noted that any such proposals would need to be rigorously assessed in relation to their impact on the National Park landscape.</p> <p>b) There is an existing average speed camera scheme within the Peak District National Park. The scheme covers the A54 and A537 roads within the South West Peak area of the National Park. The scheme was introduced with the agreement of the National Park Authority due to the ongoing and severe road safety issues associated with the route during the early years of this century. Predominantly, the issues were related to the use of the route by leisure motorcyclists and had resulted in the 'Cat and Fiddle' route being described consistently rated as the most dangerous road in the country (EuroRAP).</p> <p>The scheme has been in place for 10 years and there is now a requirement to update the infrastructure including the provision of additional cabinets at each camera location to ensure passive safety for road users in the event of any collision with the cameras.</p> <p>The scheme itself is visually intrusive within the landscape and along with the associated signage has an urbanising effect on what is an open moorland landscape. Photos provided at Appendix 1 show the existing scheme at various locations within the National Park across the A537 and A54 corridors. It should be noted that for the new scheme, additional cabinets</p>	<p>The A628 Woodhead Road sits outside the DCO application boundary. Average speed cameras are not part of the A57 Link Road Scheme.</p> <p>Insofar as there are predicted increases in traffic in the A628, should the scheme be implemented, National Highways, in its capacity as the highways authority for this section of road, regularly assesses journey times, traffic flows and accident statistics along its whole network. As part of these assessments National Highways regularly analyses the data to identify trends or issues taking action to develop proposals to address any areas of concern as deemed necessary.</p>

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			<p>will be provided, the cameras will be pole rather than gantry mounted and an infra-red array will be attached to each pole.</p> <p>The Peak District National Park Authority adopted a Transport Design Guide Supplementary Planning Document in 2019. This document includes a section on Enforcement Cameras. Paragraph 14.16 states: - <i>“Whilst recognising the traffic calming effects of average speed camera schemes, the Authority is also concerned about the visual intrusion of such schemes. Given the visual impact that average speed cameras (and their associated infrastructure) have on the setting of the National Park; the Authority’s preferred approach would be to utilise other measures as discussed above, to address the enforcement of speeding vehicles. The delivery of further average speed camera schemes should only be considered in extremis, and may be opposed by the Authority without sufficient evidence to support their introduction.”</i></p> <p>c) Our preference would be for softer measures aimed at making the route less attractive for users of other routes. This is particularly the case in relation to the M62 which is an eminently more suitable route for strategic journeys compared with the A628.</p> <p>Such measures could include a lowering of the speed limit to 50mph, bringing it in line with the majority of the surrounding rural ‘A’ road network. Such a measure was identified within the previous Highways Agency Mottram-Hollingworth-Tintwistle bypass scheme along with a range of other traffic restraint measures. A reassessment of these measures might prove useful in reducing the indirect effects of the scheme on the A628(T).</p>	
9.70.58	3.27	<p>Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant’s consideration of transport networks, traffic, alternatives, access, severance, walkers, cyclists, or horse riders?</p>	<p>We have remaining concerns as highlighted within our previous representations regarding the impact of the scheme on crossing points for walkers, cyclists and horse riders caused by increased traffic flows on the A57 Snake Pass and A628(T) in particular. We are also concerned of the effects of increased traffic flow on both the actual and perceived safety of vulnerable road users. At a time when the government is seeking to encourage cycling as a form of transport, the public propensity to cycle can be seriously affected by both perceptions of safety and the volume of traffic.</p> <p>We are also concerned that the applicant does not appear to have undertaken a thorough assessment of alternatives to the scheme, that are not based around increasing road capacity.</p>	<p>National Highways has nothing further to add.</p>
9.70.59	4.5	<p>Does Peak District National Park Authority have any concerns about indirect effects in the vicinity of routes through the Peak</p>	<p>Our principle concerns relate to the effects of induced traffic flows on the A57 Snake Pass and A628 (T). We have demonstrated these concerns within our previous representation, Local Impact Report, and in answers to</p>	<p>With regards to assessment thresholds please refer to National Highways’ response to question 3.5 and 7.5 of the Examining Authority’s Second Written Questions (REP6-017).</p>

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		<p>District National Park apart from the A57 Snake Pass? Please provide reasoning.</p>	<p>Examining Authority's first questions and to those raised at Issue Specific Hearing 2. As stated previously, we also believe that the screening out of impacts on the A628(T) because the predicted increase in AADT in 2025 (Do something) is 40 vehicles below the DMRB threshold is regrettable, as it means that such impacts have not been robustly assessed.</p> <p>We are also concerned about the effects of rerouted traffic on Monks Road. Whilst the predicted increase in traffic is not as high as for either the A628(T) or the A57 Snake Pass, it is a minor road with an undulating topography. The road is crossed by a number of footpaths that can only be linked by sections of road walking. Any increase in traffic represents a risk to those users and uses.</p> <p>The A6024 has a lower increase in AADT, however, its junction with the A628(T) is challenging, so this may have a knock-on effect on road safety.</p> <p>The indirect effects of increased traffic flow have not been adequately considered by the applicant's assessment. By their own methodology (LA107 Landscape & Visual effects), landscape and visual receptor sensitivity is classed as 'very high'.</p> <p>Given the 'very high' sensitivity of the receptors, even minor or negligible magnitudes of adverse effect have the potential to result in significant effects. This has not been addressed or acknowledged by the assessment.</p> <p>Further to our answer re. 3.11 / 3.12 above, additional scheme elements with direct effects (average speed cameras) are now being considered within the park landscape. It is very important that all potential effects of the scheme are considered within the decision-making process, so this is potentially a significant omission.</p>	<p>Average speed cameras are not part of the A57 Link Road Scheme. National Highways is liaising with Derbyshire County Council to investigate what measures have been assessed and adopted along the A57 Snake Road in order to address the pre-existing issues. These discussions have identified a number of solutions that have been adopted and implemented along the route and we are looking at additional options to complement the existing safety measures. The potential introduction in the future of average speed cameras to enforce the existing speed limit 50mph speed limit introduced in 2007 is amongst them, with DCC looking at this type of solution of enforcement on two other routes within their highway authority. Whilst no commitment has been made, National Highways has offered to assist DCC with the evaluation of options along this corridor. However no firm commitment to the extent of this support has been agreed as DCC is continuing to assess and evaluate options, and any such measures and agreements would be outside the DCO.</p>
9.70.60	4.8	<p>a) Does the Applicant have any other comments on the Peak District National Park Authority's responses under the heading of "Peak District National Park (PDNP)" in its Deadline 4 submission [REP4-012]?</p> <p>Does the Peak District National Park Authority have any other comments on the Applicant's responses under Items 4p and 4t in its Deadline 4 submission [REP4-008]?</p>	<p>b) We believe that the applicant is merely re-stating their position and misunderstands ours.</p> <p>We do not request for 'all levels of significance to be material considerations' (potentially significant effects should be material considerations), but we consider that the assessment process either under estimates or fails to adequately consider potential effects within a National Park landscape.</p> <p>We re-state that a low magnitude of effect has the potential to result in significant effects on 'very high' sensitivity receptors. This is not considered by the assessment process.</p>	<p>The methodology used in Chapter 7 of the ES (REP6-006) considers the sensitivity of receptors and uses the significance criteria in accordance with DMRB LA 107. The magnitude of the effect is explained in each instance and there are no direct effects of the Scheme on the PDNP.</p>

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			It is also possible that direct effects on the Park will take place (3.11 and 3.12) – consideration of wider effects is again a significant omission in the assessment.	
9.70.61	4.9	<p>Peak District National Park Authority [REP2-048, REP2-055 and REP4-012] is questioning the Applicant's assessment in relation to the consideration of Peak District National Park.</p> <p>a) Please could the Peak District National Park Authority comment on the implications of their concerns for the matters noted as "Agreed" in their draft Statement of Common Ground with the Applicant [REP2-024]?</p> <p>Please could the Applicant and Peak District National Park Authority ensure that matters that are either agreed or not agreed are set out in the final signed copy of their Statement of Common Ground and submit this before the end of the Examination?</p>	<p>a) The Peak District National Park Authority apologises to the Examining Authority and to the applicant for any confusion in this matter. Owing to the tight timescales involved, the Local Impact Report and the Statement of Common Ground were being produced consecutively and this resulted in the concerns raised within the Authority's representations not being reflected within the Statement of Common Ground. We recognise that this means that the Applicant's assessment regarding the consideration of impact on the Peak District Peak District National Park was erroneously stated as agreed.</p> <p>b) The Peak District National Park Authority will work with the applicant to ensure that the final signed copy of the Statement of Common Ground fully reflects the areas that both parties agree or disagree on.</p>	National Highways notes this response. Subject to receipt of confirmation from PDNPA of the revisions required to the Statement of Common Ground (SoCG), National Highways will work with PDNPA to update the SoCG as required.
9.70.62	4.12	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of the Peak District National Park?	<p>The Authority's main concerns are highlighted elsewhere within these written questions or within our previously submitted documents and verbal statements at Issue Specific Hearing 2.</p> <p>Principally they stem from the weight that should be accorded to any indirect impacts on the Peak District National Park as a result of the scheme. Longstanding national policy puts great weight of the protection of National Parks from development either within the National Park or affecting land within it.</p>	National Highways notes this response. In relation to the correct approach to applying national policy, National Highways refers to its written response to questions 4.3 and 4.4 of the Examining Authority's second written questions [ref REP6-017].
9.70.63	5.2	The Applicant [REP2-021 Q5.1] set out its consideration of the July 2021 update to the National Planning Policy Framework. Is the Peak District National Park Authority satisfied with the Applicant's explanation?	<p>No, the Peak District National Park Authority is not satisfied with the applicant's explanation, which does not address our comments raised in our previous response. Our response is not related to the limited changes in the July 2021 update, but the fact that the assessment does not comply with the 'material' issues put forward within the NPPF. It also does not give adequate weight to National Park purposes as defined in either paragraphs 176 and 177 of the NPPF or within Section 62 of the Environment Act (1995).</p> <p>We are unsure why the applicant considers that the NPPF is not applicable to this scheme as no highway exemptions are outlined in the NPPF? We were referencing the point that the NPPF and DMRB are not aligned (which was explicitly acknowledged by the applicant). We repeat our query from our previous response below:</p> <p><i>8.2.5 With reference to the NPPF and the DMRB, the applicant's response that 'it is possible that the two documents may conflict', it would appear that the applicant acknowledges the misalignment between the documents. It would appear to</i></p>	National Highways refers the PDNPA to its responses to questions 4.2, 4.3 and 4.4 of the Examining Authority's second written questions [ref REP6-017].

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			<p><i>be the case from the applicant's assessment methodology that the DMRB 'outweighs' the NPPF?</i></p> <p>Please note that this has not been addressed – the applicant states that the NPPF is not applicable and that 'the scheme has been designed in accordance with the DMRB', which again would appear to indicate that the applicant believes the DMRB is either in accordance with the NPPF or 'outweighs' it.</p> <p>There appears to be some misunderstanding from the applicant about the role of the NPPF? 'The Applicant has also checked the assessments that have been undertaken as part of the Environmental Impact Assessment to ascertain whether methodologies from the NPPF have been relied upon'. The NPPF sets out the Government's planning policies for England and how these policies should be applied, it does not define methodologies (as DMRB / GLVIA3 do).</p>	
9.70.64	5.10	<p>a) Please could the Applicant set out the consideration given to design options for street lighting, including the height and spacing, whether it can be omitted, and how light pollution and glare could be mitigated.</p> <p>b) Please could the local authorities and Peak District National Park Authority comment?</p>	<p>Generally speaking, the area of the National Park immediately to the east / south-east of the scheme (including the A628(T) and A57 Snake Pass) has the darkest night skies. Dark skies are important for nocturnal wildlife and offer people the chance to experience the beauty of the night sky without the glare of artificial light. Whilst the scheme is located within an area that is already well-lit, it is important that light disturbance associated with the scheme is managed / mitigated for the benefit of wildlife on the National Park fringe and for the protection of night-time views from the National Park.</p>	<p>National Highways refers the PDNPA to its response to question 5.10 of the Examining Authority's second written questions [ref REP6-017].</p>
9.70.65	7.5	<p>The Applicant [REP4-008 Item 7dd and 7ee] has set out its approach to screening, the use of DMRB LA 105 guidance. It noted that lower thresholds are set out in Institute of Air Quality Management guidance, but that is specifically intended for residential and mixed used developments and highways schemes have their own set of criteria and thresholds to be used.</p> <p>a) Please could the Applicant provide the IAQM screening criteria, compare it with the DMRB LA 105 and provide reasoning why it considers that IAQM screening criteria are not appropriate? Is the Applicant suggesting that if the modelled increases in traffic levels are the same then the type of project that led to the increase in traffic would make a difference to the receptors?</p> <p>b) Would a variation of the screening threshold be appropriate for links within the Air Quality Management Areas?</p> <p>c) Please could Tameside Metropolitan Borough Council, High Peak Borough Council and Peak District National Park Authority comment?</p>	<p>The Applicant [REP4-008 Item 7dd and 7ee] has set out its approach to screening, the use of DMRB LA 105 guidance. It noted that lower thresholds are set out in Institute of Air Quality Management guidance, but that is specifically intended for residential and mixed used developments and highways schemes have their own set of criteria and thresholds to be used.</p> <p>c) The Peak District National Park Authority is concerned that an assessment of the air quality impacts of the scheme on Tintwistle AQMA have not been undertaken. Given the very small difference between meeting the threshold and not doing so (40 vehicles or 4%) then a precautionary approach would appear to have been reasonable; especially given the government impetus behind improving air quality within non-compliant areas.</p> <p>e) The Peak District National Park Authority would support a reassessment of the impacts on air quality as a result of traffic increases through the High Peak Borough AQMAs. The best case would be that the assessment indicates no impact on compliance. However, if the scheme is likely to affect compliance then there is an opportunity to identify measures to</p>	<p>Please refer to National Highways' response to question 3.5 and 7.5 of the Examining Authority's Second Written Questions (REP6-017), with regard to traffic screening criteria used to determine the need for further assessment. Please also refer to National Highways' response in regard to compliance with the Air Quality Directive within Tintwistle AQMA in the CPRE PDSY Written Representation Response (submitted at Deadline 7).</p>

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		<p>The ExA [EV-015 Item 7ee] asked the Applicant to comment on how the screening is consistent with the potential for a very small increase in Nitrogen Dioxide (NO₂) to result in non-compliance with the Air Quality Directive / Air Quality Standards Regulations 2010? The Applicant responded [REP4-008 Item 7ee]. The Applicant is predicting increases in traffic, which the ExA understands is likely to result in increases in NO₂ emissions.</p> <p>The ExA is concerned whether enough consideration has been given for those increases to result in a non-compliance, even if the increases in traffic are below 1,000 AADT. It is also concerned about the consideration given to receptors within Air Quality Management Areas designated for NO₂ that are just outside the study area.</p> <p>d) Please could the Applicant comment? Please could Tameside Metropolitan Borough Council, High Peak Borough Council and Peak District National Park Authority comment?</p>	<p>mitigate a worsening of air quality accordingly. It is important that due consideration is given to this matter.</p> <p>The issue overall raises concerns about how the screening in or out of indirect impacts is undertaken as part of the scheme development process.</p>	
9.70.66	7.11	<p>Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of air quality?</p>	<p>As detailed within our earlier submissions, we have remaining concerns that figures for nitrogen deposition, whilst they are below the AADT threshold, are only marginally so. If the margin of error falls above a 95% significance level then further consideration of the potential impacts of nitrogen deposition should be undertaken and form part of an appropriate assessment. This is on the basis that a significant impact on SAC qualifying habitats cannot be ruled out.</p>	<p>Please refer to National Highways' response to question 3.5 above.</p>
9.70.67	8.12	<p>Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of climate change?</p>	<p>Regarding 9.59 Applicant's response to Issue Specific Hearing 2 Item 6 c) and d) Cumulative Carbon Assessment. Specifically, 2.2.13 which states that "there is no sectoral target for transport, or any other sector, and that emissions in one sector, or in part of one sector, may be balanced against better performance in others." It would strengthen the applicant's case to demonstrate exactly which areas of better performance are being used to counter balance the additional emissions generated by the scheme. The Climate Change Committee's recommendations for surface transport require a 63% reduction in carbon emissions from 2019 levels to live within the Government's Targets associated with its sixth carbon budget. This would suggest that varying rates of improvement are inevitable but an expansion of emissions cannot be disregarded as it will place additional pressures elsewhere that maybe difficult to manage.</p> <p>In 2.2.14, the applicant states that they believe there is no legal requirement to assess the impact of an individual scheme against the total carbon emissions from RIS1 and RIS 2. However, for an impact assessment to be robust it must consider the context within which the development is occurring</p>	<p>To meet the 2050 target and interim carbon budgets, action is required to reduce GHG emissions from all sectors. It is not possible to state which areas of better performance should be used to counterbalance the additional emissions.</p> <p>Please refer to paragraph 2.2.17 of REP5-026, which states: <i>National Highways is therefore unable to produce a baseline at a local or regional scale itself. Such a baseline would have to be consistent with the Government's understanding of the likely implications of its policies over time in a particular geographic area. In relation to carbon reductions, those policies are myriad and extend to matters beyond the planning system and into issues relating to the use of fiscal incentives / disincentives to manage carbon emissions across the country as a whole.</i></p> <p>And paragraph 2.2.21 <i>Overall compliance with, or attainment of, 'carbon budgets' and 'the 2050 zero target' under CCA 2008, and the 'UK's Nationally Determined Contribution' under the Paris Agreement are the responsibility of Government to manage as they are</i></p>

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			<p>and therefore the total additional emissions due to RIS1 and RIS2 are relevant context and should be included in the assessment.</p> <p>In 2.2.23, the applicant states ‘for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government’s carbon budgets.’ The release of carbon due to the construction and operation of the project is an output and not an impact. The impact is global warming. Therefore, the applicant should attempt to assess full the impact of the scheme and consider how those impacts can be mitigated. If there is no alternative then perhaps through sequestration elsewhere. The cost of which should be identified.</p> <p>The response generally presents the position that the impacts are difficult to assess and therefore it is unreasonable for them to have to consider them as part of the proposal. However, the Government provides supplementary guidance to the HM Treasury Green Book on the appraisal and evaluation of energy use and greenhouse gas which is intended to aid decision making in these complex areas. It would be reassuring to see that National Highways had used this or an equivalent cost benefit analysis when determining the suitability of their proposals.</p>	<p><i>matters of national policy and not policies set at an individual scheme level</i></p> <p>The assessment in Chapter 14 of the ES (REP1-019) has considered how the Scheme has the potential to affect global warming by increasing GHGs in the atmosphere, and the resulting effects are global rather than affecting one localised area. Please refer to the Applicant’s response to Issue Specific Hearing Item 6a (REP4-008) with reference to the assessment of the direct effects of the Scheme on global warming. It is considered that there are no material impacts on the achievement of carbon budgets from this Scheme, including when the embedded / committed mitigation for GHG emissions has been considered.</p> <p>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, that was available at the time the strategic case was prepared in 2021.</p>
9.70.68	9.3	<p>The Applicant [REP2-021 Q6.5] said that “<i>major adverse magnitude of impact</i>” [REP1-015 Table 6-3] equates to substantial harm, while lesser magnitudes of impact equate to less than substantial harm.</p> <p>a) Do the local authorities or Peak District National Park Authority have any concerns about the equivalence of magnitude of adverse effect to level of harm or whether the NPPF tests have been addressed correctly?</p> <p>b) Please could the Applicant update the ES to include the explanation and clarify how the NPPF tests have been addressed?</p>	<p>a) In our previous comments we said “The levels of harm should be consistent with the wording of the NPPF (i.e. ‘substantial,’ or ‘less than substantial’)”. Nuance within the ‘less than substantial’ category can help define lower levels of harm. Therefore, ‘minor harm’ should still be ‘less than substantial’, but at the lower end of this scale’. Table 6.3 REP1-015 has not been altered to address this, it is still referring to ‘limited harm’ within the ‘minor adverse’ section – I think Moderate, Minor and negligible Harm should equate to varying levels of ‘less than substantial’ harm.</p> <p>b) Have the NPPF test been addressed correctly? We think this is quite a challenging question, given the different languages of the DMRB and the NPPF; the methodology is a reasonable attempt to bring the two together but I feel that the level of harm is lost in the extra step of the DMRB assessment of significance of effects, and the space for the balanced decision-making which weighs up the benefit(s) of the scheme with the harm caused is lost. I think this is a criticism of the different policies/processes (NPPF, DMRB) rather than this report per se.</p> <p>It would be beneficial to have the level of harm in NPPF language, i.e. ‘substantial’ or ‘less than substantial’ (including a range within this latter category) stated in Table 6.5.</p>	<p>National Highways refers the PDNPA to its response to question 9.3 of the Examining Authority’s second written questions [ref REP6-017] and the revised version of Chapter 6 of the Environmental Statement submitted at Deadline 6 [ref: REP-018].</p>

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9.70.69	9.6	The Applicant [REP2-021 Q6.8] has set out its consideration of impacts on Tintwistle Conservation area and the listed buildings and scheduled monuments identified by Peak District National Park Authority in their Local Impact Report [REP2-048 paragraphs 8.4.5 and 8.4.7].	We agree that the impact on the setting or the ability to appreciate the scheduled monuments is likely to be negligible. With regard to Tintwistle Conservation Area however, we consider it to be an asset of High value. The increased traffic will have an impact on it, and the planning process will need to give 'great weight' to its conservation.	<p>A medium value was assigned to Tintwistle Conservation Area in consideration of its historic and architectural interest. This interest is considered to be on a regional rather than national scale.</p> <p>As set out in Table 6-2, and based on the assessment criteria within DMRB LA 104, we have assigned Tintwistle Conservation Area a medium value as it is an asset of medium or high importance and rarity, on a regional scale and has limited potential for substitution.</p>
9.70.70	9.11	Apart from the issues covered elsewhere in these second written questions, please could the Peak District National Park Authority summarise any remaining concerns that it has about the Applicant's consideration of the historic environment?	In our previous comments we said that we consider Grade II Listed Buildings and Grade II Registered Parks and Gardens to be of High Value; they are of national importance. This also applies to Conservation Area and non-designated assets of national importance. This is not reflected in Table 6.2.	<p>See response to 9.6 above.</p> <p>Grade II Listed Buildings and non-designated assets of regional or national importance are assigned a medium value as they are assets of medium or high importance and rarity, on a regional scale and have limited potential for substitution.</p> <p>Grade I and II* Listed Buildings, and Grade I and II* Registered Parks and Gardens are assigned a high value as assets of high importance and rarity, on a national scale, and have limited potential for substitution.</p>

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