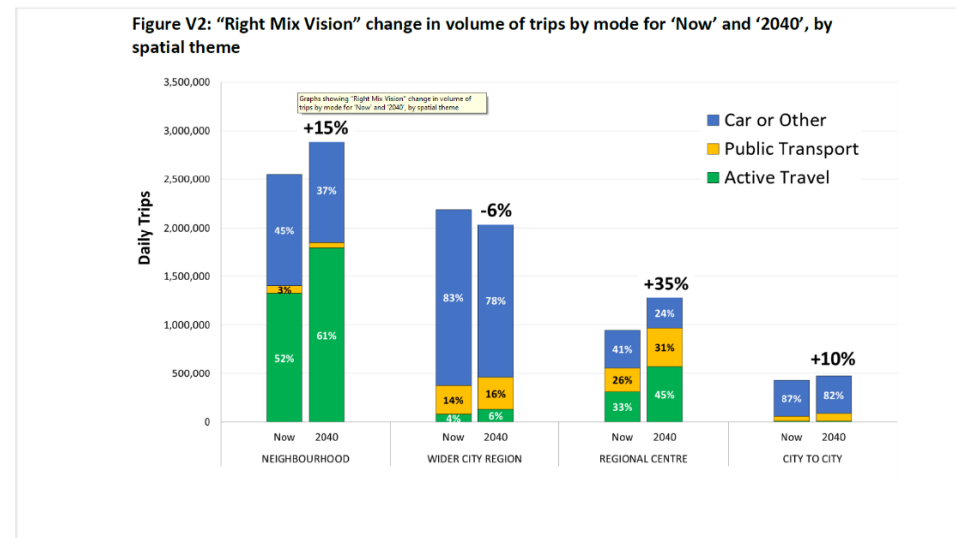


TR010034 DEADLINE 9 - CPRE PDSY REBUTTAL OF REP8-018 - NH'S POST-HEARING RESPONSE TO ISH3 QUESTIONS

REFERENCE NUMBER	ISH 3 QUESTIONS AND NH RESPONSE TO THEM [REP8-019]	CPRE RESPONSE TO NH REP 8-019
Item 2 Transport Networks and Traffic		
9.75.4	No traffic data collected during the Covid-19 pandemic has been used in the traffic modelling for the Scheme	If this is the case then why does the Case for the Scheme and ES Ch.6 Air Quality refer to data collected and used in the traffic modelling (summarised in REP8-045)? NH says observed flows are used to calibrate and validate the model ie they are used in the traffic model – If data collected during the Covid pandemic was used to check the calibration and validation of the model we still don't know the implications of this.
9.75.6	Vehicle kilometres in South Pennines Regional model area, ADM and Local Study area	In 2025 there would be 84,000 extra daily vehicle Km in ADM and 39,000 extra daily vehicle Km in the local study area. Any increase in car trips is clearly not in accord with the GM Transport Strategy, and an increase in the local study area is particularly contrary to the Right Mix vision. This is in addition to the wide area re-routing which leads to increases in traffic leaving and entering the area of 26% at the M67 roundabout and 26% through the A628/A57 cordon in 2025. The equivalents for 2040 are increases of 27% and 29% respectively (Figures 7.1 and 7.2 of the Transport Assessment Report).
9.75.9	Methods to verify model outputs from the baseline model to accurately reflect journey times and flows	Calibration of journey time shows complete exclusion of Greater Manchester west of M67 J4 and of all of South Yorkshire. We drew attention to the need for realistic journey time comparisons in our initial data requests.
9.75.12	NH show how the scheme supports GM Transport Strategy 2040 and/or DfT Decarbonisation Plan - "Right Mix" vision sets out how modal trips are to be allocated using spatial themes, to secure an overall vision of 50% of trips to be made by sustainable modes. For City-to-City trips, active travel is not a realistic alternative and is targeting a 5% reduction in car mode share from 87% currently to 82% by 2040.	The Right Mix Strategy, which is being reviewed in light of new Government targets and the Pandemic, has been used by CPRE to inform the assessment of the CPRE alternative package. It is a good example of a variable demand forecast used to test alternative options that NH consider "unconventional". Although offered in rebuttal, the NH response seems to confirm our view, that the vast majority of car trips in the model will be subject to demand reduction, not just through slower growth but in absolute terms. This has been the subject of previous submissions by CPRE, referring to the Right Mix Strategy. While it reproduces a relevant part of the Right Mix vision, NH's answer seems to imply that City to City trips are the most important for this scheme. However these

trips are a very small percentage of the traffic forecast. We have undertaken a further calculation from the NH matrix data to confirm this point. If the total trips originating in the local area (Sector 1) and travelling to all 25 sectors covering the whole of Britain are the baseline, 94% of those trips go to immediately adjacent sectors. Excluding the rural Sector 7 from this produces 93%. All of these trips are therefore relatively short distance (relevant for non-rail mode switch) and in areas directly affected by the Right Mix policies.

For convenience CPRE also reproduces the Right Mix chart. This shows a decrease in car trips of 6% for local neighbourhood journeys, 12% for the wider city region and 21% for trips connected to the regional centre. These are precisely the categories which form the vast majority of the trips most relevant to this scheme.



NH have simply ignored the impact of these policies on their traffic forecasts. It should also be noted that no trip length distribution for the Mottram link has been supplied to back up the NH rebuttal. However, the matrix analyses undertaken by

		<p>CPRE using NH data both the new one above and already submitted to the DCO show its importance.</p> <p>That the scheme is not supportive of these modal changes is also shown by the vehicle kilometres finally provided by NH in answer to 9.75.6. It is worth noting that such basic vehicle kilometres data was originally requested by CPRE in March 2021. With the scheme there is an increase in traffic within the ADM of 84,000 veh kms in 2025 and within the local study area of 39,000 veh kms. Any increase in car trips is clearly not in accord with the GM Transport Strategy, and an increase in the local study area is particularly contrary to the Right Mix vision. This is in addition to the wide area re-routing which leads to increases in traffic leaving and entering the area of 26% at the M67 roundabout and 26% through the A628/A57 cordon in 2025. The equivalents for 2040 are increases of 27% and 29% respectively ((Figures 7.1 and 7.2 of the Transport Assessment Report).</p>
<p>9.75.14</p>	<p>NH to explain how existing public transport services have been modelled, with particular regard to whether the totality of existing public transport usage is represented and potential modal transference to, or from, busses and train services as a result of changes on the road network resulting from the scheme? Clarify how the model reflects future public transport usage? Does it allow for, or reflect, any future growth in the sector?</p> <p>NH answer: A regional 'mode-choice' transport model has been used to forecast the potential mode shift to or from car-based trips due to forecast changes in rail services; exclude buses as any potential mode shift to or from buses will have a negligible effect on the traffic forecasts used to assess the Scheme.</p>	<p>This dismissal of public transport should be of great concern to the DCO. One of the key points we have been trying to ascertain (see D6 submission) is what assumptions were made about public transport use in future years. Our understanding is that there is an assumption of slow decline but despite our requests there has been no data provided.</p> <p>We now know that public transport (apart from regional rail) and active travel are excluded from the modelling. Yet NH did not give any indication that they defined public transport as rail (apart from one footnote to the sector map in one worksheet) throughout the extensive correspondence and meeting minutes. The term public transport is always used and NH has continued to confuse the definitions between rail, public transport as a whole, trips which were included or not included in the model and in fact how the limited rail modelling was undertaken. This is clear from the automated transcript of ISH 2 and accords with our notes. At 25.26 Mr Buchan states that the totality of public transport does not appear to be in the model. Mr Katesmark responds that:</p> <p><i>"just to clarify that the model has taken account of public transport in that there is a separate model, that look multi modal model that was used at the initial stages. And the that does look at the public transport improvements in the area at the top at the time."</i></p> <p>He goes on</p>

		<p><i>" And the highways model that we've used is is an iterative model with that public transport model, that other multi modal model. So it does take account of them to some degree. It doesn't deal with buses in a specific detail, but in broad terms, it does take account of public transport."</i></p> <p>Some of this is not correct and it also implies another model being used for public transport. We have of course asked for details of this but none have been forthcoming.</p> <p>In fact this model was used for rail only and thus there is no bus in NH's multi-modal model. This has not yet been finally confirmed despite our efforts to get something agreed for a SoCG, for example the email sent on 16th March (as before we refer to public transport as a whole). Our best guess is that there is a separate coarsely zoned rail model but we await NH's response. This is yet another missing element concerning the basic structure of the appraisal which should have been clear at submission stage. The fact that the DCO is about to close and we still don't have such detail is not acceptable if normal standards of transparency are to be met.</p>
9.75.15	<p>Clarify how the figures in the matrices were derived and the perceived lack of correlation between trips to and from some sectors.</p> <p>NH answer It's a consequence of the way the matrices are structured – not OD but production attraction format</p>	<p>It is finally clear that NH have supplied the highways matrices in O&D format but not the PT Commute and Home based business matrices (which are in fact car available rail only). On the other hand, the non-work PT trips have been supplied in the O&D format. This is again an issue that should be the subject of technical discussion to clarify and agree.</p>
9.75.16	<p>What effect would this have on the modelling of benefits / disbenefits resulting in passenger travel times?</p> <p>NH answer: minimal</p>	<p>The Right Mix Strategy plans for increases in public transport use of 5% outside the regional centre and 60% for trips related to it. Bus trips would be very relevant for the types of journey being undertaken locally.</p>
9.75.17	<p>Potential changes to travel patterns that would result from improvements to the Hope Valley railway line, with particular reference to both passenger and freight services? How is this reflected in the model?</p> <p>NH answer: Model does not include improvements to HV line nor are they anticipated to result in significant mode shift</p>	

9.75.29	<p>dd) Clarify whether the primary purpose of the A57 Link is to take traffic off the Strategic Route Network onto the local road network? NH answer: No it is not. Changes in total vehicle kilometres within the ADM are: SRN 2025: +1.4% LRN 2025: -0.4% SRN 2040: +1.3% LRN 2040: -0.0%</p>	<p>This is potentially misleading. NH must show the SRN and LRN clearly since they may change between the DM and DS. For example, is the new section of the A57 a trunk road? The existing section almost certainly isn't. Changing classification could be causing the changes. Making the SRN longer by building the bypass of Mottram Moor would automatically increase vehicle kilometres. The A628 is part of the SRN at the moment since it is controlled by NH but seems to lose traffic in the DS to the A57. How is the latter defined in the analysis? Again the information provided is incomplete and insufficient for proper scrutiny.</p>
9.75.31	<p>If there is an effect on highway safety on these routes (trans-Pennine), why is it not addressed within the DCO? NH answer: Changes in road safety are not considered significant enough for mitigation</p>	<p>The COBALT model assumes a linear relationship of increasing volume of accidents with increasing traffic flows and uses 24 hr AADT, as NH said in ISH3 Session 2 Transcript 49.59. However NH may be underestimating the number of accidents on the Snake Pass, as DCC <u>current</u> traffic counts (not estimates) on the Snake Pass of 4,200 AADT are 38% higher than the 3,050 AADT modelled in DM 2025. This suggests NH could be underestimating the potential increased risk in crashes by 38%.</p>
9.75.34	<p>Alternatives and NPSNN para 4.26 & 4.27 ii) How has NH have considered alternatives to the proposal, at what stage and how that assessment complies with the requirements of the NPSNN? NH answer: The Scheme has been subject to a full options appraisal prior to achieving its status in the Road Investment Strategy and was subject to further feasibility and optioneering studies post the Road Investment Strategy announcement.</p>	<p>There has been ongoing dialogue between CPRE and NH regarding the appraisal of options since August 2021 as follows.</p> <ul style="list-style-type: none"> • NH email 24 Aug 2021 to CPRE: <i>I can confirm that we have not repeated the Early Appraisal Sifting Tool (EAST) since finalising the options in 2015. Following the initial and second sift of individual and package options, EAST was last used in the final stage of sifting to identify the options most likely to achieve desired outcomes and contribute towards the schemes key objectives.</i> • NH in REP4-009 <i>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.</i> • CPRE in REP5-028: <i>The 2015 high level assessment of options was not repeated and this was confirmed by email. Since this is the key part of the Strategic Assessment, without this it cannot be claimed that the Strategic Case has been updated.</i> • NH in REP7-025, 9.69.8: <i>The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option.</i>

	<p>jj) Since the assessment of alternatives, have strategic objectives for the scheme changed in response to policy or other factors and whether, with reasons, the assessment of alternatives remains relevant? NH answer: The objectives have not changed since the assessment of alternatives. As such the assessment of alternatives remains relevant</p>	<ul style="list-style-type: none"> NH in REP8-019 <i>The scheme was subject to further feasibility and optioneering studies post the Road Investment Strategy announcement.</i> (We are not told which RIS announcement) <p>What are we to make of this most recent answer? It is a complete reversal of what NH has said previously. The results of the further feasibility and optioneering should be made available to the Examination immediately. It is unacceptable that at this late stage NH is changing its story on what review of the strategic case it has undertaken.</p> <p>jj) This is a misleading answer. The objectives <u>have changed significantly</u> since the assessment of alternatives as in shown in Table below Objectives for the Scheme in 2015, 2018 and 2020/2021. The objectives have changed as follows:</p> <ul style="list-style-type: none"> The connectivity objective in the 2015 TransPennine Routes Feasibility Study included <i>'reduction in journey times and improved journey-time reliability'</i>. The reference to <i>'reduction in journey times'</i> was not included in the objectives for the 2018 and 2020 consultations or the DCO application. The latest objective is concerned only with journey time reliability, which is not the same as journey time reduction. The connectivity objective was also changed to include journeys <u>through</u> Mottram Hollingworth and Tintwistle. The environmental objective changed from avoiding the impacts on the PDNP and optimising environmental opportunities, to dropping optimising environmental opportunities and specifically including improving air quality and reducing noise. The societal objective has been rephrased from addressing the levels of severance on the TransPennine routes in urban areas to reconnecting local communities. The resilience and safety objectives, present in the 2015 and 2018 consultation documents, were removed from the 2020 consultation documents and from the DCO application documents.
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	<p>The removal of 'reduction in journey times' from the connectivity objective suggests that further work post-EAST analysis NH found that journey times would not decrease. In answer to questions about journey times within the Examination, NH has used the term journey reliability which is not the same. Until the full journey times between Manchester and Sheffield centres are presented NH's claim of journey time improvements remains unsubstantiated.</p> <p>The inclusion of journeys <u>through</u>, not within, Mottram, Hollingworth and Tintwistle emphasises the impact of the villages on trans-Pennine connectivity rather than promising them any improvement.</p> <p>The loss of optimising environmental opportunities means the objective seeks only to avoid impacts on the PDNP and could no longer be interpreted as encompassing the first statutory purpose of the Park to 'conserve and enhance'.</p> <p>The removal of the safety and resilience objectives take attention away from the worsening of road safety that the scheme would impose on both the SRN and local road network. In 2015 the scheme scored beneficial for solving the accident problem and against the resilience and safety objectives. Now it would score adverse impact against all of these. The scheme removes traffic from the safer M62 motorway onto the A628 trunk route, and increases the risk of crashes on trans-Pennine routes and on residential streets. Crashes on the dual carriageway would be more severe due to the 50mph speed limit. This is despite the inclusion in the traffic modelling of the safety and technology measures along the trunk route ie NH has mitigated for crashes along the trunk but despite this the risk of crashes increases.</p> <p>These changes have not been explained by NH. The removal of the safety and resilience objectives and the failure to include a carbon reduction objectives means the assessment of alternatives cannot be upheld.</p> <p>We have shown elsewhere how the scheme fails to meet its objectives [REP5-028 pp2-4].</p>
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Objectives for the Scheme in 2015, 2018 and 2020/2021

Objective	2015 XPennine Routes Feasibility Study Stage 1 report para 1.4.2	2018 Statutory consultation PEIR para 2.2.1	2020 statutory consultation PEIR Vol.1, 2.2.1; 2021 DCO application ES Ch.1-4 para 2.2.1
Connectivity	Improving the connectivity between Manchester and Sheffield through reduction in journey times and improved journey-time reliability;	By reducing congestion and improving the reliability of people's journeys between the Manchester and Sheffield city regions	By reducing congestion and improving the reliability of people's journeys through Mottram in Longdendale, Hollingworth and Tintwistle and also between the Manchester and Sheffield city regions
Environmental	Avoiding unacceptable impacts on the natural environment and landscape in the Peak District National Park, and optimising environmental opportunities;	By improving air quality and reducing noise levels in certain areas, through reduced congestion and removal of traffic from residential areas. The scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the Peak District National Park	By improving air quality and reducing noise levels in certain areas, through reduced congestion and removal of traffic from residential areas. The Scheme is also being designed to avoid unacceptable impacts on the natural environment and landscape in the PDNP.
Societal	Improving air quality and reducing noise impacts, and addressing the levels of severance on the trans-Pennine routes in urban areas;	By re-connecting local communities along the Trans-Pennine route.	By reconnecting local communities along the Trans-Pennine route
Capacity	Reducing delays and queues that occur during peak hours and improving the performance of junctions on the routes;	By reducing delays and queues that occur during busy periods and improving the performance of junctions on the route	By reducing delays and queues that occur during busy periods and improving the performance of junctions on the route
Resilience	Improving the resilience of the routes through reductions in the number of incidents and reduction of their impacts;	By reducing the number of incidents and by the use of technology to advise drivers of incidents along the route.	
Safety	Reductions in the number of accidents and reductions in their impacts.	By reducing the number of accidents along the route through targeted improvement measures.	

REFERENCE NUMBER	ISH 3 QUESTIONS AND NH RESPONSE TO THEM [REP8-019]	CPRE RESPONSE TO NH REP 8-019
Item 3 PDNP		
9.75.36	Regard to National Park purposes	NH's response fails to understand the purposes, how they should be met or how NH must fulfil its s.62 duty under the Environment Act 1995.
9.75.37	<p>Regard to National Park policy -</p> <p>In its answer NH refers to the Esso Southampton to London Pipeline Development Consent Order and the Examining Authority's Recommendation Report – it is a DCO which passed through the South Downs National Park. NH quotes the ExA statement that NPSNN prevails over NPPF and no reference was made to NPPF by the ExA except in relation to the Green Belt</p>	<p>The words that NPSNN prevails over NPPF are not to be found in NPSNN or in NPPF, with good reason. The relevance of NPPF will vary from case to case and circumstances may arise where the relevance of NPPF may be greater than NPSNN.</p> <p>In the ExA's recommendations on the Esso Pipeline development the ExA relied not only on NPSNN but also on the South Downs National Park Authority Local Plan. With respect to the A57 Link Roads, the PDNPA's Core Strategy and Development Management Policies strongly reflect the national policy framework NPPF. Unlike NPSNN, in 2020 when the Esso pipeline was determined the Energy NPS was not considered out of date.</p> <p>The one instance where NPSNN is clearly stronger than NPPF and does have a specific policy for the SRN - para 5.152 which refers to planning of the SRN should avoid National Parks – NH has chosen to ignore it. Failure to attend to it has led to the current difficulties.</p> <p>NH also argues that the scheme can only enhance landscape if works are taking place within the Park. This is incorrect since landscape and tranquillity can be enhanced by reducing or removing traffic, which requires no work to take place within the Park. This is the measure that NH should seek to implement.</p> <p>When asked by the ExA (WQ2 Item 3d) to what extent policies aimed at traffic restraint (including encouraging routes that avoid the National</p>

		Park), reducing reliance on motor vehicles and encouraging active travel within the traffic model, had been considered and reflected in the model, NH answered [REP4-006] that an option to restrict HGVs using routes through the Peak District National Park had been considered at option appraisal. From this and later representations regarding the omission of public transport and walking and cycling from the traffic model, it is clear no traffic restraint has been considered.
9.75.38	Application of 'great weight' to assessment of LVIA. NH continues to claim it has applied 'great weight' to that assessment and supplies Appendix A to demonstrate this.	Appendix A is a rehearsal of the previously reported methodology and its results. It tells us nothing new and reinforces that 'great weight' has not been applied.
9.75.42	Indirect effects on the PDNP – as requested NH has supplied noise levels for increases of traffic up to 132 (52.6%) on the A57 and up to 107 (9.9%) on the A628	These results do not address the impact on tranquillity, which is a complex construct as we demonstrated in REP4-015.
9.75.43	Great weight has been applied through the assessment of LVIA	We do not agree that the magnitude of impacts from the increased traffic on both trans-Pennine roads is negligible – it is minor. For both landscape and visual sensitivity minor change on receptors of high sensitivity leads to a magnitude moderate/large significance [REP6-006 ES Ch.7 Tables 7.14 & 7.19]. A moderate significance is a material consideration.
Item 4 Water Environment		
9.75.67	The sequential test and the Exception Test have been met	We disagree. There are alternatives that would avoid all road building within the flood risk zone 3, and the sustainability benefits claimed in the Case for the Scheme are limited in the extreme, and do not apply to the community that would experience the increased risk of flooding [REP7-036 pp23-24].
Item 5 Air Quality		
9.75.73	f) the traffic modelling provides the worst case scenario for traffic impacts in Glossop	We do not know the worst case scenario since the Glossopdale roads have been excluded from the traffic model. Government guidance TAG Unit M3.1 (See extract below) specifically states that roads in residential areas ' <i>especially rat runs</i> ' should be assessed. It may be difficult ' <i>but it is desirable that the effectiveness of the scheme in attracting this traffic back to the main road network, is accurately assessed</i> '. At present the scheme is being modelled to take traffic away from the main road

		<p>network A57 through Glossop and onto residential streets. The diversions off the A57 onto residential roads are significant – e.g. flows in 2025 DS diverted onto Dinting Road (1,400 AADT) from the A57 High Street West (11,250 AADT) represent 12% of the A57 flows. This diversion created by the scheme must be fully addressed.</p> <p>TAG Unit M3.1 Highway Assignment Modelling, para 2.4.2 <i>‘For a model created for a specific scheme, the network should include all main roads, as well as those secondary routes, and roads in residential areas (especially ‘rat-runs’), that are likely to carry traffic movements which could use the scheme being assessed, either in the base year or in future years, and that are significant in relation to the capacity of the scheme. Modelling this ‘rat run’ traffic may present some technical difficulties, but it is desirable that the effectiveness of the scheme in attracting this traffic back to the main road network, is accurately assessed. Local highway authorities will normally be aware of the common ‘rat-runs’, but some independent assessment may also be required. In the absence of count data, accident plots may also give an indication of alternative routes that vehicles are using to avoid local congestion points’.</i></p>
9.75.77	<p>HPBC made a request for certain receptor locations representative of qualifying features (residential properties) to be modelled using the more pessimistic National Highways alternative Long Term Annual Projection Factors (LTTE6) methodology as set out in DMRB LA 105 paragraphs 2.47 to 2.55. That analysis is being undertaken</p>	<p>We await the results.</p>
<p>Item 6 Climate Effects</p>		
9.75.78	<p>Cumulative effects - the ExA is minded to consider local policies as “important and relevant” matters. Please could the Applicant comment? NH agrees that local policies relating to Climate Change are capable of being important and relevant matters, Local budgets are not important or relevant matters; emissions from a particular policy or project is managed within the Government's overall strategy for meeting carbon budgets and the net zero target as part of an</p>	<p>We welcome the agreement that local policies on climate change are important. So are local budgets and targets and both NPSNN and guidance on the Env Regs 2017 require an assessment against them.</p>

	<p>economy-wide transition and any local budgets should not be important or relevant.</p> <p>The Scheme is aligned with increasing the use of public transport and active travel modes and phasing out fossil fuelled private vehicles as per GMCA's Five Year Environmental Plan</p>	
9.75.80	<p>Should the cumulative effects on climate change of the Proposed Development with other projects within a geographical area be considered against a threshold that is set for a similar geographical area?</p> <p>NH answer No effects on climate are not localised, they need to be considered on a global scale</p>	Yes
9.75.81	<p>Does achieving net zero by 2050 require reductions to be made to carbon emissions from sources in isolation that are by themselves negligible or de minimis?</p> <p>NH answer Yes Achieving net zero by 2050 does require reductions from all sources, regardless of them being negligible or de minimis in isolation – have applied the carbon reduction hierarchy and Net Zero Highways Plan</p>	NH agrees reductions in carbon emissions are required. This the scheme fails to do.
9.75.82	<p>NH explains how EVs would outweigh GHG emissions in the future</p>	NH does not answer this question but refers to the impact of charging point infrastructure and Defra's various versions of EFT. We have shown in REP2-069 4.4.40 that electrification of the vehicle fleet could lag well behind the required reduction in GHG.
9.75.83	<p>f) Please could the Applicant comment on whether the term "so significant" should be interpreted as being at a higher threshold than "significant"?</p> <p>NH answer: Relative to national carbon budgets it is considered that emissions were at a 'de minimis' scale, and do not represent a material effect.</p>	We commented on this in REP4-031

9.75.84	Is DMRB 114 consistent with NPSNN on significant? Quotes IEMA guidance which states (in bold) that: “The crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050”.	NH should test the scheme’s emissions against the UK Net Zero Strategy trajectory for carbon reduction. See REP4-031 clearly shows how the scheme emissions fail to follow the required trajectory for reduction.
9.75.85	Answer to 9.75.84 is yes DMRB 114 and NPSNN are consistent	
9.75.	In response to being asked to provide details of assessment against IEMA guidance – NH states we have sought to minimise carbon emissions in line with IEMA	IEMA guidance does not support the NH case as set out in REP7-035
Item 7 General Environmental Matters		
9.75.94	SOCG WITH TFGM - The strategic planning aspects included in GMCA’s Places for Everybody Greater Manchester Spatial Strategy are being progressed on behalf of TMBC and are thus addressed, where appropriate, in the SoCG with TMBC.	On 25 th April we received the email from TfGM to NH concerning strategic planning aspects that we requested at ISH3. This has been submitted separately to Deadline 9.
9.75.106	GREEN BELT - clarify the consideration given to level differences of the proposed carriageway from existing ground level, the heights of bunds above proposed carriageway level and the environmental barriers in its consideration of openness, material harm to openness and local Landscape Character?	We await TMBC’s response to Green Belt Issues to be submitted at Deadline 9.
9.75.108	GREEN BELT - The ExA is considering whether the Proposed Development preserves openness and whether it should be considered as inappropriate development in the Green Belt. aa) please set out the case for the very special circumstances that would be needed for the Proposed Development to proceed?	We await TMBC’s response to Green Belt Issues to be submitted at Deadline 9.

	NH response – VSC set out in Case for the Scheme and any other harm in addition to openness is already included in the Case for the Scheme – see long list there	
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