

A57 Link Roads

TR010034

**9.84 Applicant's Comments on Deadline 9
Submissions**

Rule 8(1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

May 2022

Infrastructure Planning

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The Infrastructure Planning (Examination Procedure) Rules 2010

A57 Link Roads

Development Consent Order 202[x]

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1. Introduction

1.1.1. This document provides the comments of the applicant, National Highways, in response to the Submissions made at Deadline 9 as requested by the Examining Authority at Deadline 10 in its amended Rule 8 letter dated 11 April 2022. Comments have been provided on the following documents:

- REP9-032 Derbyshire County Council - Comments on submissions for Deadline 8;
- REP9-033 High Peak Borough Council - Response to outstanding matters from April hearings;
- REP9-034 Peak District National Park Authority - Comments on submissions for Deadline 9;
- REP9-035 Peak District National Park Authority - Comments on the Report on Implications for European Sites;
- REP9-036 Tameside Metropolitan Borough Council - Comments on submissions for Deadline 8;
- REP9-038 Climate Emergency Planning and Policy - Comments on submissions for Deadline 8;
- REP9-039 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8 - Email correspondence between Transport for Greater Manchester and National Highways;
- REP9-040 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8;
- REP9-041 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8 - Supplementary CPRE Technical Note: BCRS with new carbon values;
- REP9-042 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8 - Response to the Applicant's Issue Specific Hearing 3 post hearing submission;
- REP9-043 CPRE Peak District and South Yorkshire - Comments on the Report on Implications for European Sites;
- REP9-044 Daniel Wimberley - Comments on the Applicant's response to Deadline 5 submissions;
- REP9-045 Daniel Wimberley - Comments on the Applicant's response to Deadline 6 submissions;
- REP9-046 Environment Agency - Comments on the ExA's schedule of changes to the draft Development Consent Order and comments submissions made by the Applicant for Deadline 6 and 8;
- REP9-047 National Grid Electricity Transmission Plc - Update on engagement with the Applicant;
- REP9-048 National Trust - Comments on the Report on Implications for European Sites;

- REP9-049 Peter Simon - Comments on submissions for Deadline 8;
- REP9-050 Sharefirst My Journey to School - Comments on the ExA's schedule of changes to the draft Development Consent Order;
- REP9-051 Stephen Bagshaw - comments on submissions for Deadline 8; and
- REP9-052 Roy Hollins - Comments on the Proposed Development.

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. REP9-032 Derbyshire County Council - Comments on submissions for Deadline 8

2.1. Item 7: Other Environmental Matters – Green Belt

- 2.1.1. Summary of key points made by Interested Party: DCC considers works to enable the construction and operation of a highway scheme would fall within the provisions of paragraph 150 of the NPPF.
- 2.1.2. DCC agrees with the applicant that there is no definition of 'very special circumstances' set out in the NPPF or NN NPS and whether very special circumstances exist is likely to depend on the facts and circumstances of the individual application, and that that 'openness' is a matter not of legal principle but of planning judgement for the planning authority or the inspector.
- 2.1.3. DCC considers that a key factor which would appear to be an important justification for the scheme in terms of very special circumstances, is that the location of the Scheme in the Green Belt would appear to be unavoidable as it relates to the need to mitigate severe congestion on existing road routes, which are surrounded by Green Belt.
- 2.1.4. From the County Council's point of view, the key consideration in terms of impact on openness of the Green Belt relates to the proposed landscape and visual mitigation for the scheme. The principles of proposed landscape mitigation for the scheme have been agreed and appropriately incorporated in the LEMP to DCC's satisfaction.

2.2. National Highways' response

- 2.2.1. National Highways agrees with DCC's position on very special circumstances and the need for a green belt location.

3. REP9-033 High Peak Borough Council - Response to outstanding matters from April hearings

3.1. Item 7 – Other Environmental Matters

- 3.1.1. HPBC broadly accepts NH's approach to establishing the case for very special circumstances but make a number of comments in connection with traffic and air quality.
- 3.1.2. Whilst overall journey times between Glossop and the named settlements within Greater Manchester will be reduced, journeys between Glossop, Hadfield and Tintwistle (i.e. those that trips that do not utilise the new highway) are more likely to experience a disbenefit due to additional traffic on the existing highway network and the absence of any plans to mitigate impacts outside of the DCO boundary.
- 3.1.3. Although it is accepted that the scheme will achieve the benefits as outlined above in terms of moving traffic away from the front of properties in Mottram and Woolley Bridge and decreasing severance on the de-trunked section of the A57, it will increase such issues elsewhere. In particular, along Shaw Lane and Dinting Road which are forecasted to experience increases of over 1000 AADT. The impacts of this traffic growth have not been addressed. The potential need for junction improvements, a pedestrian crossing to enable safe journeys to school across Dinting Road and the implications of on-street parking on Shaw Lane which prohibit two way traffic movements remain unresolved.
- 3.1.4. At the time of writing, the applicant has failed to properly assess the impacts of the scheme on the Air Quality Management Areas at Dinting and Tintwistle. As such, claims regarding significant improvements to air quality at sensitive human health receptors cannot be verified.

3.2. National Highways' response

- 3.2.1. The Scheme is forecast to result in an increase in traffic on some roads, with reductions on other roads. However, the displacement of traffic onto alternative and less suitable roads is overall greater without the Scheme than with it.
- 3.2.2. Junction delay is generally the most dominant factor in journey times across the modelled road network, rather than average speeds along roads. Journey times in the base model on key routes have been calibrated against observed journey times, therefore the impact of any on-street parking on traffic flows will inherently have been accounted for in the model. Consequently, the presence of on-street parking is not anticipated to result in any significant change in modelled journey times or effects on noise and air quality even with the forecast increases in traffic flows due to the Scheme.
- 3.2.3. The Scheme does not result in increases in traffic flows along Dinting Road sufficient to trigger the need for any new controlled pedestrian crossings. When the assessment of the Scheme was undertaken there was no committed scheme that included a new pedestrian crossing across Dinting Road. Consequently, the traffic modelling for the Scheme does not include such a crossing. However, any

controlled pedestrian crossing across Dinting Road in the vicinity of Dinting station is very unlikely to be called sufficiently frequently to result in any material impact on average hourly vehicle journey times along the Dinting Road/Shaw Lane corridor, since pedestrian demand will be very intermittent. Thus, inclusion of a controlled pedestrian crossing on Dinting Road in the traffic modelling would be highly unlikely to alter the forecast routing of traffic across the road network.

- 3.2.4. The Applicant acknowledges that the Scheme is expected to lead to an increase in traffic on Shaw Lane and Dinting Road that exceeds the DMRB LA 105 traffic scoping criteria of 1000 AADT and receptors adjacent to these links have therefore been included in the air quality modelling presented in the Environmental Statement Chapter 5: Air Quality (REP3-006). Receptors adjacent to Shaw Lane and Dinting Road are not expected to exceed the Air Quality Strategy (AQS) objectives either with or without the Scheme. In line with DMRB LA 105 guidance (paragraph 2.89 to 2.96) the impact of the Scheme at these locations would not therefore result in a significant effect on human health.
- 3.2.5. The Applicant has continued to discuss the approach to assessment of the Air Quality Management Areas at Dinting and Tintwistle with HPBC, however the Applicant maintains their position that the DMRB LA 105 traffic scoping criteria provide a robust and appropriate threshold for defining the air quality study area for the assessment of significant effects of air quality of highways schemes. Therefore, it is not necessary or appropriate to undertake any further assessment within the Air Quality Management Areas which are not located within the Scheme study area. The Applicant's and HPBC's positions are provided in the Addendum to the Statement of Common Ground with High Peak Borough Council (REP8-017).

4. REP9-034 Peak District National Park Authority - Comments on submissions for Deadline 9

4.1. Item 3 of the Issue Specific Hearing – Indirect effects

4.1.1. Summary of key points made by Interested Party: The PDNPA believes that the Environmental Statement does not adequately assess the impact of the Scheme on the tranquillity and quiet enjoyment of the National Park, and that neither WebTAG or DMRB fully reflects the sensitivity of National Parks or their special qualities.

4.2. National Highways' Response

4.2.1. National Highways has previously responded to the above points on indirect effects, most recently through the Applicant's response to Second Written Questions (REP6-017) and under Item 3 of the Applicant's written Summary of Issue Specific Hearing 3 (REP8-019). National Highways maintains its position on the approach to assessing indirect effects and disagrees with PDNPA's view.

4.3. Other environmental matters – Green Belt

4.3.1. Summary of key points made by Interested Party: PDNPA notes that the Green Belt is located outside of the National Park and so Tameside MBC and High Peak Borough Council have the primary role in considering effects on the Green Belt. PDNPA consider the scheme is likely to have an effect on the openness of the Green Belt, and would be concerned if the scheme included proposals to change the Green Belt boundary.

4.4. National Highways' Response

4.4.1. National Highways has previously responded to the above points about the impact (both in terms of spatial and visual aspects, including landscape character) of the Scheme, including raised sections, on the openness of the green belt. Please see the Applicant's written Summary of Issue Specific Hearing 3 (item 9.75.106 in REP8-019) and the response to 5.11 in the Applicant's response to Second Written Questions (REP6-017). National Highways disagrees with PDNPA's view.

4.4.2. Aside from the area of Green Belt required to facilitate the Scheme, no additional changes to the Green Belt boundary are proposed. Such changes can only take place through the local plan process.

5. REP9-035 Peak District National Park Authority - Comments on the Report on Implications for European Sites

5.1. Site Peak District Moors (South Pennine Moors Phase 1) SPA

- 5.1.1. Summary of key points made by Interested Party: PDNPA were requested by the Examining Authority to comment on whether the information provided by the Applicant alleviates their concerns about the potential for likely significant effects to the qualifying bird features of the SPA.
- 5.1.2. PDNPA responded to say that it is not just the noise level in dB which will impact disturbance, but the duration and frequency of the disturbance. The predicted traffic flows show significant increases in traffic levels, and therefore on the frequency of disturbance, particularly on the A57.
- 5.1.3. The PDNPA also comment that the Waterbird Disturbance Mitigation Toolkit, which the Applicant refers to, is designed primarily for considering impacts on wintering flocks rather than birds on their breeding grounds, as is the case within the Peak District Moors SPA, which are likely to be more susceptible to disturbance.
- 5.1.4. The PDNPA also comment that there is no clear evidence that predicted noise levels have the potential to cause moderate to low behavioural change, with or without the development, and that the Applicant, does it recognise that, whilst existing traffic levels may cause some disturbance, an increase in traffic levels, as predicted, is likely to increase the level of disturbance.
- 5.1.5. Finally, the PDNPA re-state their position that there is no evidence that the birds are habituated. Bird populations may already be reduced by existing levels of road use- indeed research into bird disturbance suggests there is likely to be an existing impact; and any further increase in traffic levels (with a particularly significant percentage increase predicted on the A57) is likely to increase levels of disturbance.

5.2. National Highways' response

- 5.2.1. National Highways has previously responded to the above points through paragraphs 8.6.2 and 8.6.3 within the Applicant's response to PDNPA's Local Impact Report, Item 5 of the Written summary of Applicant's case at ISH2 (REP4-008), and the response to Q12.4 of Applicant's responses to Examining Authority's Second Written Questions (REP6-017). National Highways maintains its position on the approach to assessing the potential for likely significant effects to the qualifying bird features of the SPA.

5.3. Peak District Moors (South Pennine Moors Phase 1) SPA

- 5.3.1. Summary of key points made by Interested Party: The PDNPA responded to say that, on further consideration of the information, whilst they feel that any traffic

increase is likely to increase the risk of collision, they accept that there is little information to suggest that road collision is currently a significant issue for the SPA species, and they therefore accept that whilst there may be an increase in collision risk, this is marginal and unlikely to have a significant effect on the population of any of the SPA bird species.

5.4. National Highways' response

5.4.1. No further response required.

5.5. Peak District Moors (South Pennine Moors Phase 1) SPA

5.5.1. Summary of key points made by Interested Party: The PDNPA re-iterate their concern that no statistical confidence levels for the predicted traffic flows appear to have been submitted, and it is therefore entirely possible that the predicted increases in traffic levels could exceed the AADT thresholds set out in the DMRB, and therefore require further assessment.

5.6. National Highways' Response

5.6.1. The traffic modelling for the Scheme has been undertaken in line with Transport Appraisal Guidance published by the Department for Transport (DfT), a method that is industry standard and widely recognised as appropriate and proportionate for decision making purposes. The traffic model has therefore been developed in line with DfT requirements and the modelled outputs are verified. The baseline traffic flow outputs from the Scheme specific traffic model are calibrated against both recorded traffic flows journey times on roads crossing defined cordons around the modelled area and screen lines across it to ensure good correlation and that the model is, therefore, representative of the operational performance of the existing road network. . Where correlation of modelled journey times and traffic flows with observed data does not meet the required standard, the base model is calibrated by adjusting relevant parameters in the traffic model until good correlation is achieved.

5.6.2. National Highways maintains its position on the approach to assessing the potential for visual disturbance from increased traffic flows along the ARN for all bird qualifying features.

5.7. Peak District Moors (South Pennine Moors Phase 1) SPA

5.7.1. Summary of key points made by Interested Party: The PDNPA do not consider a significant impact likely from habitat changes affecting availability of prey species.

5.8. National Highways' Response

5.8.1. No further response required.

6. REP9-036 Tameside Metropolitan Borough Council - Comments on submissions for Deadline 8

6.1. Item 7 – Green Belt

- 6.1.1. Summary of key points made by Interested Party: TMBC considers that the Proposed Development will impact on the openness of the Green Belt, as the nature of the Green Belt is currently largely open countryside - the Proposed Development will affect the spatial openness as the area covered by the link will be permanently 'lost' and will no longer be countryside.
- 6.1.2. TMBC notes that the proposed landscaping treatment is likely to reduce the visual impact to some degree as the current character is open, but considers that screening of the route with trees and planting and environmental bunds will cause material harm to the openness in the context of Local Landscape Character.

6.2. National Highways' response

- 6.2.1. NH has previously responded to the above points about the impact (both in terms of spatial and visual aspects, including landscape character) of the Scheme, including raised sections, on the openness of the green belt. Please see the Applicant's written Summary of Issue Specific Hearing 3 (REP8-019) and the response to 5.11 in the Applicant's response to Second Written Questions (REP6-017). NH disagrees with TMBC's view.

7. REP9-038 Climate Emergency Planning and Policy - Comments on submissions for Deadline 8

7.1. Introduction

7.1.1. Summary of key points made by Interested Party: Sets out that comments are provided on National Highways submission "A57/REP8-019, "9.75 Applicant's written Summary of Issue Specific Hearing 3".

7.2. National Highways' response

7.2.1. No response required.

7.3. Responses to REP8-019, Section 6 "Climate Change"

7.3.1. Summary of key points made by Interested Party: Sets out comments on REP8-019 under twelve sub-sections numbered 2.1 to 2.12.

7.4. National Highways' response

7.4.1. Responses are provided where the Applicant has comments to make on specific sub-sections or paragraphs. Where a sub-section or paragraph is not specifically referenced then the Applicant either no comment or nothing further to add beyond previous responses.

Sub-section 2.1 Carbon budgets and targets

7.4.2. Paragraph 10 - The data source of the table has been redacted, but the Applicant has identified that this is derived from "Net Zero Strategy: charts and tables (updated 5 April 2022)", tab "3v.Transport", data on rows 43 and 44 compared to cell AG40 (2019 emissions – central estimate).

7.4.3. Paragraph 13 – There is a substantial lead time for the preparation of an environmental statement for publication and it is not possible to fully revise an environmental statement at every point that there is a change to the legal and policy framework. A proportional approach has been undertaken to update the assessment of carbon emissions to account for the more recent Defra vehicle emission factors (Defra EFT v11, published in November 2021) and to provide projections indicative of the Net Zero Strategy (NZZ) / Transport Decarbonisation Plan (TDP) delivery pathway. The Applicant have presented the further assessment in REP5-026. This was on a consistent basis to other National Highways projects at DCO, including the A38 Derby Junctions and the M54 M6 Link Road. For the latter, there has recently been a decision to grant development consent by the Secretary of State.

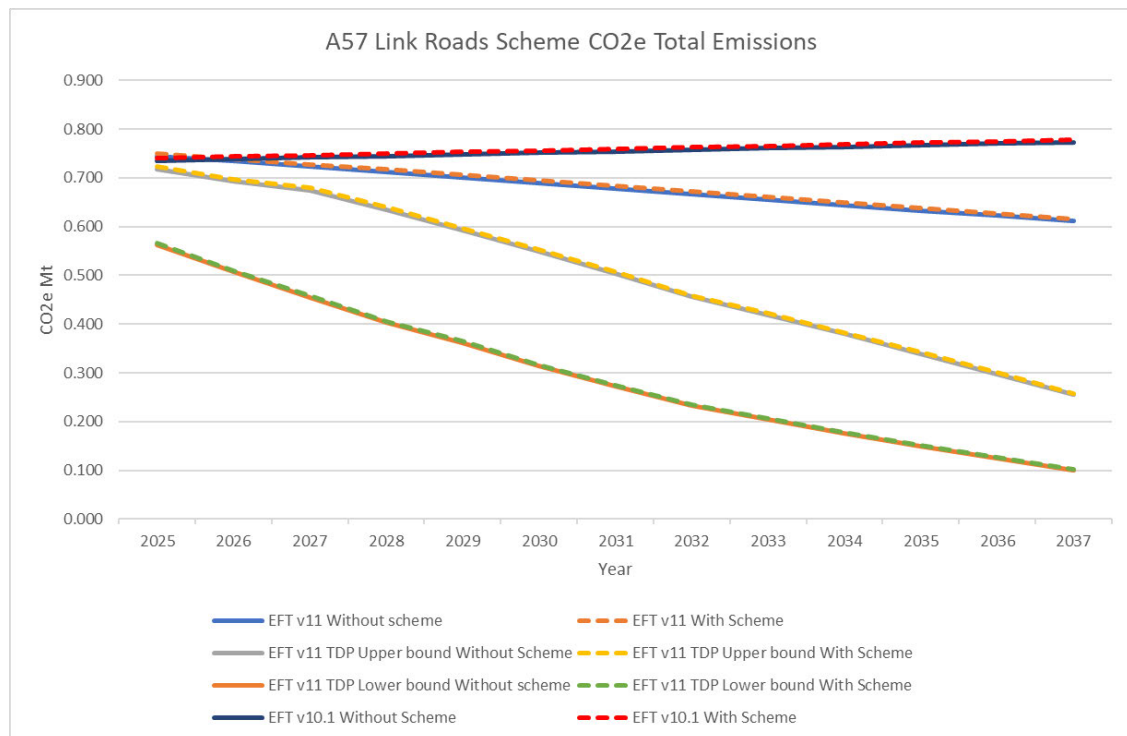
Sub section 2.2 Carbon budgets and targets in the NN NPS

7.4.4. Paragraph 20 – The Applicant maintains their position that the scenarios used in the assessment of carbon emission are appropriate. The scenarios that have been assessed within the Applicant's assessment is considered to be in line with reporting set out within section 7.3 of the IEMA guidance page 31 "What should

be included when reporting on GHG emissions within an ES chapter” (The full IEMA guidance document is included in REP8-032).

*Sub section 2.3 REP8-019/9.75.78 corresponding to EV-039/Item 6/a)
 Cumulative effects/local and regional policies and budgets*

7.4.5. Paragraph 30 (including graph). The Applicant does not agree with the trend line given in the graph for “A57 (DS-DM)/EFT v11 interpolate”. The Applicant has not been able to reproduce the data used to create the chart from data the Applicant provided in REP5-026 Table 1, but believes that the interpolation of emissions between 2025 and 2027 has not taken account of the 4th carbon budget period (2023 to 2027) only being the sum of the emission change for the years 2025 to 2027 (3 years of the 5 year period). The emission for the 5th carbon budget period (2028 to 2032) are the sum of the emission change for 5 years and as such are higher than the 4th carbon budget period value. Year by year CO₂e emissions have been presented in REP9-027 Appendix A, which show that there is a year on year reduction in the absolute CO₂e emissions and the change in CO₂e emissions between 2025 and 2040. Emissions are assumed to be static after 2040 as this is the latest year for which traffic model data is available. As a comparison to the chart in the REP9-048 at paragraph 30, the chart below shows trends in CO₂e emissions for the period to 2037 based on the Applicant’s year by year CO₂e emission calculations.



7.4.6. Paragraph 31 - EFT v11 emissions would not be expected to fit the NZS trajectory. As set out in REP8-018 Appendix A, EFT v11 was an update to the EFT v10.1 which was used in the environmental statement assessment, however it does not fully reflect the most recent government policy and expectations on electrification of the vehicle fleet. The assumptions on greater uptake rates of electric vehicles predate announcements by the Government in 2021 on plans to increase the speed of electric vehicle uptake and do not take account of the TDP

published in July 2021. A further sensitivity test was undertaken to reflect the TDP with emissions changes presents for upper and lower bounds for the 4th, 5th and 6th carbon budget periods within REP5-026, table 1.

*Sub section 2.7 REP8-019/9.75.82 corresponding to EV-039/Item 6/e)
Electrification*

- 7.4.7. Paragraph 40 and 41 – As stated in the response above in relation to paragraph 31, EFT v11 emissions would not be expected to fit the NZS trajectory as the assumptions in EFT v11 on greater uptake rates of electric vehicles predate announcements by the Government in 2021 on plans to increase the speed of electric vehicle uptake and do not take account of the TDP. Year by year CO₂e emissions presented in REP9-027, Appendix A, show that there is a year on year reduction in the absolute carbon emissions and the change in carbon emissions between 2025 and 2040, which indicated that increasing electrification of the vehicle fleet is outweighing any emission increase that would come about due to traffic growth between 2025 and 2040.

7.5. Chapter 3 Conclusions

- 7.5.1. Summary of key points made by Interested Party: The Interested Party restates their position regarding the status of the examination for the Scheme.

7.6. National Highways' Response

- 7.6.1. National Highways does not have any comments to make.

7.7. Appendix A

- 7.7.1. Summary of key points made by Interested Party: Presents a parliamentary question and response in relation to how local authorities should proceed with developing locally based transport sector decarbonisation targets for Local Transport Plans.

7.8. National Highways' Response

- 7.8.1. National Highways does not have any comments to make.

7.9. Appendix B

- 7.9.1. Summary of key points made by Interested Party: A commentary is presented on “*What is a carbon budget and how does it point to the truth?*”

7.10. National Highways' Response

- 7.10.1. National Highways does not have any comments to make.

8. REP9-039 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8 - Email correspondence between Transport for Greater Manchester and National Highways

Reference	IP Issue	NH Response
9.84.1	<p>Statement of Common Ground (SoCG) between NH and TfGM REP2-019</p> <p>TfGM is not a party at the Examination preferring to use a SoCG with NH as its means of communicating. The SoCG between National Highways and TfGM indicates intermittent engagement since July 2016, the majority of which were emails concerned with local junction and bus stop arrangements. The final engagement in row 10.15 of the SoCG is a 12 Jan 2022 'email detailing additional strategic points that TfGM would like to discuss as part of the ongoing discussions.' An email about strategic points appears important, in the context of the failure of the traffic modelling to accurately reflect the impact on Greater Manchester and the failure of the scheme to support the goals of the Greater Manchester Transport Strategy Right Mix policy.</p> <p>At the Preliminary Meeting of the Examination on 16 November 2021, it was suggested that TMBC provide input to the SoCG requested with Transport for Greater Manchester in Annex E of the ExA's letter of 19 October 2022 [PD-006]. This request was dealt with at the ISH3 Item 7f) [REP8-027] when TMBC responded that 'Transport for Greater Manchester's Statement of Common Ground includes details of the strategic planning issues relating to the GMCA's Places for Everyone Greater Manchester Spatial Strategy, including the PFE proposals within Tameside.' At ISH3 we requested that this email be made available to the Examination. We received the email (dated 11th not 12th Jan) from NH on 25 April 2022. As supplied its formatting makes it difficult to read so we have reproduced the email below. Since the author has been redacted and it has an informal tone, the status of this email is not clear, but it is all we have so far. It does, however, raise significant issues such as the relevance of Right Mix and carbon targets, the need to 'reclaim the road' and fund a package, the need to be compatible with a future bypass of Hollingworth/Tintwistle, the A57 as 'Streets for All'. The latter would need to deal with the significant traffic increases envisaged. Overall we are concerned that this statement raises issues not before the DCO and seems to have been written without sight of the CPRE detailed analysis on the way in which the scheme impacts adversely on the Right Mix package.</p>	<p>National Highways is concluding a Statement of Common Ground with Transport for Greater Manchester, also covering Greater Manchester Combined Authority issues.</p> <p>This SoCG covers the issues raised in the email from Transport for Greater Manchester dated 11 January 2022 which was supplied by National Highways, with the agreement of TfGM, to CPRE on their request, and has been submitted by CPRE into the examination. It is anticipated that the final SoCG will be submitted by Deadline 11.</p>

9. REP9-040 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8

Reference	NH Comment	IP Issue	NH Response
REP7-036 Keith Buchan Response to REP6-017 and comments on Examining Authority's Second Written Questions (WQ2)			
9.84.2	<p>9.74.1.</p> <p>(iii) No further BCR calculations until detailed design & economic assessment in Dec 2022</p> <p>(iv) No further traffic modelling with EFTv11 calculation</p> <p>(v) Low growth scenario cannot reflect specific policies – it's based on proportional reduction in traffic demand</p> <p>(vi) NH agrees EVs will not be enough on their own but TAG database doesn't account for DfT's TDP. It also claims that TDP is aspirational future policy not current policy</p>	<p>iii) The calculations NH now criticise were submitted to deadline 4 [REP4-016 page 6 onwards] and reproduce some of NH's numbers. The assumptions were made clear: i.e. a low and high growth scenario with high and low carbon values. Their new calculations do not agree with this table and no detail is given for them. This issue should have been raised earlier and is another example of the lack of technical dialogue resulting from NH's refusal to allow direct contact between professionals on this subject. We have many outstanding clarificatory request. Meanwhile we attach the worksheet on which the CPRE calculations are based (see accompanying Technical Note comparing the scheme's BCR with old and new values for carbon) It can be seen that it replicates the central forecast correctly, so it is hard to see why NH's figures differ from ours. Transparency on calculations such as these has been extremely late or non-existent.</p> <p>iv) This approach reveals the essence of the NH approach – that they avoid as much as possible incorporating the latest transport policies and programmes and even guidance – for example the critical Uncertainty Toolkit which they have ignored. In the carbon cost case they have been forced to update the emission assumptions in the appraisal to reflect the Transport Decarbonisation Plan (TDP) following criticism at the DCO and the Panel's questions. However they have only used the part which benefits their case (faster EV take up), ignoring the traffic growth reductions which are embedded in the same TDP. We asked questions about the nature of the new test immediately we heard about it including an email the day after ISH2. This was never answered directly. The reason that excluding the lower traffic forecasts is important is that lower traffic growth means lower congestion and therefore less benefit and a lower BCR. This is why the low growth forecast supplied by NH has a significantly lower BCR. This is without allowing for the creation of more traffic by building the scheme. It is worth noting that NH say they accept that EV uptake will not deliver the TDP pathway on its own (Page 22, vi, R9.74). This is a major admission supporting our case that a TDP compliant scenario without the current road should have been tested. The omission of such a test is why we can say that use of faster EV take up to reduce carbon costs without including the part of the TDP which would damage the NH case is an inherently biased approach and is in our view unacceptable as evidence.</p> <p>v) We agree with this, but it is the best that we have due to the omission of a TDP based model run. We also agree with the implicit assumption that the model would need to be sensitive to changes in the attractiveness of walking, cycling and public transport in a way the current model clearly is not. Again this fact has taken some time to extract from NH.</p> <p>vi) TDP is current policy and linked directly to Parliament's commitment to reducing carbon emissions in the 6th Budget as well Net Zero by 2050. In addition, spending is already taking place on schemes to deliver the TDP, with £2billion allocated for future years. To call it aspirational is completely wrong and misleading. It is no more or less aspirational than the Government assumptions on EV take up and the availability of charging points. On page 44 it is clearly assigned a crucial role for the next 5 years as both policy and the policy line - trajectory - for reducing carbon emissions: 'Projecting emissions out to 2050 is inherently uncertain, and technology, behaviour and policy development will continue to evolve. This is why we have committed to the next transport decarbonisation plan within five years, to ensure transport is on the correct pathway to achieve net zero'. Beneath Fig 2 the trajectory diagram it states 'The uncertainty bands around projections reflect uncertainty on the form of final policy and uncertainties on future demand for road transport' ... 'Where feasible, uncertainty in projections reflects uncertainty on policy design, GDP, fuel</p>	<p>9.74.1 (iii) to (vi): With regard to outstanding requests – National Highways provided the year by year emissions based on the Defra EFT v11 in Appendix A of the Applicant's comments on Deadline 8 submissions, submitted at Deadline 9 (REP9-027). Further clarification on the methodology for the sensitivity test is provided by the Applicant in response to CEPP at deadline 9 (REP9-027 Section 8).</p> <p>Within the Applicants submission REP8-018 Appendix A the Applicant has made reference to REP2-090 as this contains the Applicant's A57 Economic Appraisal Package report. It was not considered necessary for the Applicant to submit the documents as they were already before the Examination.</p> <p>Regarding the Technical Note comparing the scheme's BCR (referenced in 9.74.1(iii)) with old and new values for carbon – please see National Highway's response to this submission in section 3 on REP9-041 below.</p> <p>Regarding 9.74.1 (vi) – With regard to the comment "There is significant work being undertaken by DfT on progressing on this [reflecting the NZS/TDP], with involvement from NH and consultants including CPRE's, but none of this is reflected in this case. It is important because some of this work is ongoing but a significant amount pre-dates the submission of the NH documents to the DCO.", work on methodologies to reflect the NZS/TDP within DfT and/or National Highways scheme assessment guidance is still in development, due to the very recent publication of these documents. Consequently, there is currently no published or agreed advice for scheme assessments of projects for the Applicant to refer to.</p> <p>The Applicant's further assessment of carbon emissions presented in REP5-026 was undertaken on a consistent basis to other National Highways projects that are at DCO, including the M54 M6 Link Road for which there has recently been a decision from the Secretary of State. A proportional approach, consistent with other schemes, has been undertaken</p>

Reference	NH Comment	IP Issue	NH Response
		<p>prices, trip rates, and historic volatility in emissions. The range in the policy line declines as we move out to 2050, due to a higher proportion of zero emission vehicles.' Clearly this document is about current policy. It is interesting that the TDP reflects uncertainty in a way compliant with its own advice in the Uncertainty Toolkit (i.e. the underlying parameters). There is significant work being undertaken by DfT on progressing on this, with involvement from NH and consultants including CPRE's, but none of this is reflected in this case. It is important because some of this work is ongoing but a significant amount pre-dates the submission of the NH documents to the DCO. As such NH needs to test its scheme against the trajectory. It should be noted that the uncertainty here is around the level of delivery, not the fact that delivery of lower traffic will take place.</p> <p>The UK Net Zero strategy confirms that such policies and programmes are now part of Government future planning. The Exec Summary says, 'This document sets out clear policies and proposals for keeping us on track for our coming carbon budgets, our ambitious Nationally Determined Contribution (NDC), and then sets out our vision for a decarbonised economy in 2050'. Para 20 the sector targets 'help to drive change and to plan how we can remain on track to meet our targets'. But elsewhere it says 'The uncertainties inherent in our 2050 scenarios also apply to our 2037 delivery pathway. It is designed only to provide an indicative basis on which to make policy and plan to deliver on our whole-economy emissions targets. The exact path we take is likely to differ and must respond flexibly to changes that arise over time'. In planning a transport intervention of this size it is essential that the implementation of other interventions are included in its assessment. The NH argument appears to be that because of the scheme's timing such changes can be ignored. A relevant question might be, do NH accept that future schemes will have to follow the procedures we have called for? Our view is that they clearly would.</p>	<p>to update the assessment of carbon emissions to account for the more recent Defra vehicle emission factors (Defra EFT v11, published in November 2021) and to provide projections indicative of the Net Zero Strategy (NZS) / Transport Decarbonisation Plan (TDP) delivery pathway.</p>
9.84.3	<p>Q3.6 No further response beyond REP6-017 to CPRE's claim that we do not know the worst case scenario of impacts of traffic on Glossopdale (no baseline data, impacts on safety, community severance, air and noise pollution).</p>	<p>REP6-017 focuses on how drivers use the modelled road network. 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 'especially rat runs' should be assessed. It may be difficult 'but it is desirable that the effectiveness of the scheme in attracting this traffic back to the main road network, is accurately assessed'. At present the scheme is being modelled to take traffic away from the main road network A57 through Glossop and onto residential streets. The diversions off the A57 onto residential roads are significant</p> <ul style="list-style-type: none"> - 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. Their impacts must be fully addressed but do date they have not: • The TAR Figure 3.7 shows that crashes were only modelled on the A57 and Hadfield road but on none of the other local roads. NH excluded residential roads because there would be no impact (3.7.4) but HPBC's Local Impact Report shows there would be an increased risk of crashes. • Severance is not addressed. • Classified turning counts for various junctions were taken but no baseline results are available. REP2-090 (pdf pages 498/790) refers to Appendix A PCF Stage 3 Transport Data Package (which is not available to us). DCC/HPBC's Local Impact Report para 7.7 refers to baseline turning counts in March 2018 (results were given to DCC 15th Oct 2021 according to REP1-042 RR-0240-2 NH's response to DCC's relevant rep). In the interests of fairness and transparency the baseline classified turning counts and results with the scheme should be made freely available to the Examination, and not just shared between two parties. 	<p>Regarding 9.71.1 (Q3.6) - With regard to the comment "The air quality study ended at the junction of the A626 with the A57 and excluded the majority of Glossopdale", Figure 5.2 of the environmental statement (APP-077 and APP-078) shows the road network from the traffic model included in the air quality model, as well as the air quality receptors included in the model. The traffic model road network used for the air quality model has included the A57 through Glossop and roads through residential areas which include Dinting Road, Talbot Road, B6105 Norfolk Street/Woodhead Road, Ellison Street, New Shaw Lane and Hadfield Road, Park Road and Cemetery Road.</p> <p>For the air quality assessment the traffic data from the traffic model was screened for each road link against traffic change criteria include in DMRB LA 105. For roads that met the DMRB LA 105 traffic screening criteria receptors adjacent to these roads were included within the air quality model. However, it should be noted that roads that did not meet the DMRB LA 105 traffic screening criteria were still included in the air quality model to ensure that the</p>

Reference	NH Comment	IP Issue	NH Response
		<ul style="list-style-type: none"> The air quality study ended at the junction of the A626 with the A57 and excluded the majority of Glossopdale. The noise survey excluded all of Glossopdale apart from its western edge – a short length of Woolley Bridge Lane and Hadfield Road. <p>In addition NH in ISH 2 quoted IEMA traffic increases of 30% or greater are significant [Transcript ISH2, Session 2, 59.18]. Such levels are unacceptable guidance when the Government is promoting low traffic neighbourhoods (NPPF 2021 para 92). (TAG Unit M3.1 Highway Assignment Modelling, para 2.4.2 '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'.)</p>	emissions for these roads were accounted for when determining concentrations at receptors included in the air quality model. The receptors in the Glossop area are shown in APP-077, sheet 2.
9.84.4	Q3.11.& 3.12 Average speed cameras are not part of the DCO	We have shown several times that promotion of them is as a consequence of scheme	National Highways reiterates that there are no proposals for average speed cameras as part of this Scheme.
9.84.5	Q3.17 Bus routes and journey times - No further response beyond REP6-017	This has now been clarified – there is no bus content in the main model comparable to that for traffic, and, as far as we know, no bus content at all in the rail mode split model used for what NH called "public transport" as a whole.	The modelling of public transport undertaken by National Highways is proportionate in relation to the assessment of the Scheme.
9.84.6	Q3.18 Sufficient consideration given to public transport networks? NH uses the most up to date traffic forecasts based on NTEM which does not account for Right Mix policies	Obviously NTEM is out of date, both from Right Mix but also TDP. Thus the scheme is based on out of date forecasts not reflecting new policies and programmes. It is acceptable, and normal practise in a context with high numbers of urban trips, to vary the trip rates from NTEM due to local factors and mode specific initiatives. NTEM forecasts are subject to uncertainty, especially when disaggregated to local zones or travel modes. Before using the NTEM forecasts, the following DfT guidance should be reviewed: TAG Unit M-4 Forecasting and Uncertainty NTEM Planning Guidance Unit M-4 is supplemented by the DfT Uncertainty Toolkit to which we have frequently referred and NH do not consider relevant.	National Highways have used the most up to date and recognised Department of Transport (DfT) traffic forecasts for the assessment of the Scheme.
9.84.7	Q8.2 No legal requirement to assess carbon against regional or local targets. Refers to REP5-026 post ISH 2 comments	NPSNN 4.4 requires 'environmental, safety, social and economic benefits and adverse impacts, should be considered at national, regional and local levels'. The EIA guidance requires 'The assessment should take relevant greenhouse gas reduction targets at the national, regional, and local levels into account, where available. Local and subnational SCATTER budgets and targets from the Tyndall Centre exist for TMBC, HPBC, GMCA SYMCA, SCC and TfN do exist as we showed in REP2-069. TMBC in REP2-056 response WQ1 8b) refers to GM 'reducing carbon emissions in line with Tyndall curve' and in REP6-027 response to WQ2 8.2 implies regional and local targets are important. An assessment should be undertaken against them.	National Highways maintain its position on this and the response that are in previous submissions, most recently in their ' <i>Deadline 9 Submission - 9.79 Applicants comments on Deadline 8 submissions</i> ' (REP9-027), specifically their responses 8.12, 8.14 and 8.20 to REP8-029 Climate Emergency Policy and Planning - Written summary of oral submissions at Issue Specific Hearing 3, and also response ref 9.79.117 under REP8-045 Keith Buchan on behalf of CPRE Peak District and South Yorkshire Branch - Submission for clarification following Issue Specific Hearing 3'. National Highways has no further comments to add.

10. REP9-041 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8 - Supplementary CPRE Technical Note: BCRS with new carbon values

10.1. Supplementary CPRE Technical Note

10.1.1. Summary of key points made by Interested Party: CPRE's representation presents their own BCRs with new carbon values.

10.2. National Highways' Response

- 10.2.1. The carbon values set out in CPRE's submission show values which are consistent with those reported by National Highways when accounting for the revision to the valuation of GHG emissions as set out in the updated TAG Databook (v1.17 dated November 2021). The impact of these revised values per unit of emission resulted in a total cost of GHG emissions of £30.22m under the core growth scenario. The impact of this increased level of disbenefit on the scheme BCR has been previously reported, reducing the BCR from 2.45 to 2.33, or if the contribution to wider economic impacts is excluded the reduction would be from 1.45 to 1.33 as CPRE have indicated.
- 10.2.2. The combination of low growth with high carbon values and high growth with low carbon values, as has been set out in CPRE's submission, indicates highly unlikely scenarios under which two independent parameters are pushed to a relatively extreme point within two likely ranges, resulting in a fraction of a probability of occurrence. These should therefore not be considered comparable to the plausible ranges of applying either variable individually.
- 10.2.3. Information was previously requested by National Highways on how CPRE had produced a figure of 84% to indicate the scale of trips affected by the scheme which are within the Greater Manchester area. This information has now been supplied. A review of its calculation raises the observations detailed in bullet points below. However, it should first be reiterated that the implication that the Greater Manchester trips have been excluded from the modelling and appraisal is not correct. Impacts on trips either to or from eastern areas of Greater Manchester are fully captured and only trips which are made entirely on one side of the scheme and at some distance from it have been filtered out to mitigate against model noise. To clarify further on the point of using the "fixed cost function" (FCF), again, this has not been applied across all of Greater Manchester but is used only in the central and western areas of the conurbation, where impacts of the scheme on individual links are anticipated to be low to the extent that model noise may distort the benefit forecasts in those areas. The FCF itself does not mean that costs are fixed in that area between scenarios. The term 'fixed' relates to the flow-delay function for each turn at each simulated junction – the modelled costs still vary with the modelled flows, it's just that the function is fixed and is not re-simulated at each iteration. (See SATURN Manual 15.1.2, copied below).

15.1.2 Network Simplification using Fixed Cost Curves (FCF)

The FCF transformation retains the essential **geometry** of the simulation network in that it distinguishes between separate turning movements at nodes but with **fixed** - and therefore separable - "cost-flow" or "flow-delay" curves (FCF) for each turning movement which should improve convergence and reduce "noise". FCF may be thought of as another form of "perturbation assignment" (see 22.2.6) or "diagonalisation" (see 9.1.2).

The essential idea is that, in the intermediate FCF network, the flow-delay curves for the simulation turns are "fixed" after a certain number of simulation-assignment loops (see Fig. 9.1), presumably once a reasonably "good" level of convergence has been reached. Thus, given the general flow-delay equation of the form (see Section 8.4.2):

Equation 8.1 (reproduced)

$$t = AV^n + t_0 \quad V < C \quad (a)$$

$$t = AC^n + t_0 + B*(V - C)/C \quad V \geq C \quad (b)$$

The parameters t_0 , A , n and C are all treated as fixed for individual turns rather than as variables calculated at the end of each new simulation.

A further property of an FCF ("Fixed Cost-Flow") description is that the same network properties may be applied to both a "do-minimum" and a "do-something" network in order to minimise noise between the two.

Finally we note that the structure of the "assignment network" in which simulation turns are represented by individual "links" is also unchanged under FCF; it is only the nature of the cost-flow curves on these turn-links which has changed. This in turn implies that a basic Frank-Wolfe assignment step will require roughly the same CPU time with or without FCF – although we would expect a reduction in **overall** CPU time with FCF due to a reduced number of assignment-simulation loops.

- 10.2.4. The result is still a congested assignment where flows and delays are in equilibrium; while being an approximation to a full SATURN simulation assignment, it is considerably more accurate than the result from a Buffer assignment. The economic appraisal based on FCF is still a valid form of assessment.
- 10.2.5. In view of these qualifications on the figure which had been calculated by CPRE to represent the proportion of trips using the scheme which are within Greater Manchester, the following points are noted on the calculation itself:
- 10.2.6. a large proportion of the trips included within the calculation would not be affected by the scheme to any noticeable degree. The areas included within the calculation would capture trips such as those originating from as far away from the scheme as Denton travelling into Manchester. These movements are within the Greater Manchester area but do not pass within 5 kilometres of the scheme. Trips from Hyde to Manchester are similarly included in the calculation but will not be affected.
- 10.2.7. the figure includes trips to and from Glossop, which is not part of the Greater Manchester area.

- 10.2.8. the calculation of trips within Greater Manchester has been based on trips travelling into Manchester and returning later in the day, excluding those which travel out from Manchester and then return, and those which travel to and from outer areas of Greater Manchester. The result is only a partial picture of movements within the Greater Manchester area.
- 10.2.9. The combined effect of these factors indicates a significant over-estimate of trips affected by the scheme which are contained within the Greater Manchester area.

11. REP9-042 CPRE Peak District and South Yorkshire - Comments on submissions for Deadline 8 - Response to the Applicant's Issue Specific Hearing 3 post hearing submission

Reference	NH Comment	IP Issue	NH Response
Item 2 Transport Networks and Traffic			
9.84.8	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.	See the Applicant's comments on the Deadline 8 submissions (9.79.11 – REP9-027).
9.84.9	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.	Calibration of journey times within the baseline model has been undertaken in accordance with best practice.
9.84.10	9.75.16 What effect would this have on the modelling of benefits / disbenefits resulting in passenger travel times? NH answer: minimal	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.	The Scheme does not preclude the future introduction of improved public transport services. The number of trips that could potentially switch from car-based to public transport, even with a very significant improvement in public transport provision, is unlikely to substantially alter forecast traffic growth outside of and between large urban towns and cities, which the Scheme is designed to accommodate.
9.84.11	9.75.29 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%	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.	The new link road is classified as part of the Strategic Road Network (SRN) in the presented analysis and the de-trunked sections of the A57 are classified as part of the local road network (LRN). Otherwise, the road classifications remain the same in the Do-something and Do-minimum scenarios. The analysis presented indicates that the Scheme does not result in a transfer of traffic from the SRN to the LRN, even accounting for the new link road increasing the length of the SRN, and therefore vehicle kilometres on the SRN, compared to the Do-minimum scenario.
9.84.12	9.75.31 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	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 current 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%.	The forecast changes in the number of accidents due to the Scheme is based on a comparison of traffic flow changes between the Do-something and Do-minimum scenarios. If forecast traffic flows on the A57 Snake Pass are underestimates, as suggested they may be by Keith Buchan based on DCC traffic counts, then the traffic flows on the A57 Snake Pass in both the DM

Reference	NH Comment	IP Issue	NH Response
			and DS scenarios would increase and consequently, the difference between the two scenarios would probably be very similar. Therefore, the statement that “NH may be underestimating the number of accidents on the Snake Pass” is incorrect.
9.84.13	<p>9.75.34 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?</p> <p>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. 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>	<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 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. NH in REP4-009 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. CPRE in REP5-028: 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. NH in REP7-025, 9.69.8: The updated Green Book postdates consideration of alternatives to the Scheme and selection of the preferred option. NH in REP8-019 The scheme was subject to further feasibility and optioneering studies post the Road Investment Strategy announcement. (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 have changed significantly 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 ‘reduction in journey times and improved journey-time reliability’. The reference to ‘reduction in journey times’ 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. 	<p>The appraisal of alternative options obviously needs to have taken place before the selection of the preferred Scheme for further design development and assessment in advance of the preparation of a DCO application. Therefore, it is inevitable that there is a significant time-lag between the option appraisal process and submission of the DCO application, during which time national, regional and local Government policies and objectives change. It would not be practicable to repeat the option appraisal process every time national, regional and local Government policies and objectives change following the selection of the preferred scheme.</p>

Reference	NH Comment	IP Issue	NH Response
		<ul style="list-style-type: none"> The connectivity objective was also changed to include journeys through 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. <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 through, 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>	
Item 3 PDNP			
9.84.14	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.	National Highways has nothing further to add and fully understands the purposes and what is required.

Reference	NH Comment	IP Issue	NH Response
9.84.15	<p>9.75.37 Regard to National Park policy - 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 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.</p>	<p>Paragraph 5 of the National Planning Policy Framework 2021 states: <i>5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).</i></p> <p>When the decision on the Southampton to London pipeline project was made on 7 October 2020, it had been confirmed on 25 September 2020 in the case of Vince v Secretary of State for Business, Energy and Industrial Strategy that the Secretary of State had made the provisional decision that the energy National Policy Statements should be reviewed, and that the statements should not be suspended during this review.</p> <p>This is a similar circumstance to the status of the National Networks National Policy Statement whereby a review is underway, but the statement has not been suspended during that review.</p>
Item 5 Air Quality			
9.84.16	<p>9.75.73 f) the traffic modelling provides the worst case scenario for traffic impacts in Glossop</p>	<p>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 'especially rat runs' should be assessed. It may be difficult 'but it is desirable that the effectiveness of the scheme in attracting this traffic back to the main road network, is accurately assessed'. At present the scheme is being modelled to take traffic away from the main road 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 '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.</p>	<p>National Highways response to 9.75.73 within REP9-018 was that "the forecast traffic flows across the modelled road network are considered to represent a reasonable and appropriate worst-case scenario of the traffic impacts of the Scheme through Glossop." The traffic modelling has included roads in Glossop in addition to the A57. Figure 5.2 of the environmental statement (APP-077 and APP-078) shows the road network from the traffic model that is included in the air quality model, as well as the air quality receptors included in the model. The traffic model road network used for the air quality assessment has included roads through residential areas such as Dinting Road, Talbot Road, B6105 Norfolk Street/Woodhead Road, Ellison Street, New Shaw Lane and Hadfield Road,</p>

Reference	NH Comment	IP Issue	NH Response
		<p>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'.</p>	<p>Park Road and Cemetery Road. Dinting Road, Talbot Road, Shaw Lane, Cemetery Road, Park Road and Hadfield Road were added to the traffic model as part of the traffic model refinement work undertaken for the assessment work for the 2020 consultation and 2021 DCO submission to ensure that potential alternative through routes or 'rat runs' to the A57 through Glossop were included in the traffic model.</p> <p>The traffic model is considered a worst case on which to base the air quality assessment. For the air quality assessment the traffic data from the traffic model was screened for each road link against traffic change criteria include in DMRB LA105. For roads that met the DMRB LA 105 traffic screening criteria receptors adjacent to these roads were included within the air quality model. It should be noted that roads that did not meet the DMRB LA 105 traffic screening criteria were still included in the air quality model to ensure that the emissions for these roads were accounted for when determining concentrations at receptors included in the air quality model.</p>
Item 5 Climate Effects			
9.84.17	<p>9.75.78 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 economy-wide transition and any local budgets should not be important or relevant. 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</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>National Highways maintains its position on this and the response that are in previous submissions, most recently in their '<i>Deadline 9 Submission - 9.79 Applicants comments on Deadline 8 submissions</i>' (REP9-027), specifically their responses 8.12, 8.14 and 8.20 to REP8-029 Climate Emergency Policy and Planning - Written summary of oral submissions at Issue Specific Hearing 3, and also response ref 9.79.117 under REP8-045 Keith Buchan on behalf of CPRE Peak District and South Yorkshire Branch - Submission for clarification following Issue Specific Hearing 3'. National Highways has no further comments to add.</p>

Reference	NH Comment	IP Issue	NH Response
	Environmental Plan		
9.84.18	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.	With respect to 9.75.84 – National Highways response in REP8-019 was not dismissing the use of the DfT TAG greenhouse gas worksheet as a recognised methodology. National Highways response was to disagree with the scenarios that had been used within the worksheet. The same traffic growth assumptions should be assumed under both the DM and DS scenario. The NZS/TDP delivery pathways would apply both with and without the A57 Link Roads Scheme, so a DM low growth compared to a DS central growth is not considered a valid comparison.

12. REP9-043 CPRE Peak District and South Yorkshire - Comments on the Report on Implications for European Sites

12.1. Response to PD-014 - Report on Implications for European Sites (RIES)

- 12.1.1. Summary of key points made by Interested Party: CPRE describe the '*flaws in the collection of the baseline data and the poverty of information presented to the Examination*'. They go on to conclude that this results in no confidence in National Highways' assessment of the scheme's impacts on the European sites.

12.2. National Highways' Response

- 12.2.1. The representation summarises points that CPRE have previously made throughout the DCO examination, and which National Highways have responded to. The points raised relate to the validity of the data used to inform the HRA, which National Highways maintains is fit for purpose. The points raised do not relate to the HRA directly, and for that reason National Highways does not have any further comments to add on this submission.

13. REP9-044 Daniel Wimberley - Comments on the Applicant's response to Deadline 5 submissions

Reference	IP Issue	NH Response
9.84.19	<p>IP response in reference to 9.69.114.</p> <p>First of all, thanks to HE/NH for engaging with these issues.</p> <p>About the first paragraph, this is a clear explanation of how the Bassline model is created.</p> <p>Three points:</p> <ol style="list-style-type: none"> 1. Why was I not told this in November 2020 when I first asked for this information? I suppose this now counts as ancient history but it points to one of my main concerns at this examination which is the approach and attitude of HE/NH as an agency of government. 2. I note that the model is calibrated so that the outputs match what is actually happening on the ground by effectively making tweaks to the model parameters. In other words the model parameters are not set in stone but vary according to local circumstances. This is highly relevant when HE/NH are trying to tell us what they expect to happen at the Shaw Lane junction 3. Having done these tweaks the outputs then match reality on the ground at the points where this is checked by the modellers. I wonder if this explains the anomalies which I and others have pointed out at Market Street (the Mottram Market Street not the Hollingworth Market Street) and in Glossop High Street East, two laces where traffic magically disappears down a MMMC (Magic Mystery Manhole Cover). <p>In other words, the tweaks do their job of lining up the outputs of the model with observed reality, but taken together in a different context at another part of the network, the tweaks combined produce silly results.</p> <p>About paragraphs 2,3, and 4. Here HE/NH tell us why they think their data is so much more reliable than the DFT data. Three points:</p> <ol style="list-style-type: none"> 1. HE/NH appear to be arguing that because the DfT counts include an error about vehicle classification the counts themselves are invalid. This does not follow. <p>In addition, HE/NH sow confusion over the DfT counts. In paragraph 2 they compare their Automatic Traffic Counters (ATC's) which "work on an ongoing basis" with the DfT's counts which they describe as working as follows "[they] use a mixture of automatic traffic counters and manual traffic counters and are only undertaken once a year, at most, over short periods of time (typically 7am to 7pm over at most a few days) and factored up to provide an estimated annual average daily flow (AADT). The Webtris data collected by National Highways, therefore, provides a much more accurate and reliable record of current traffic flows than the DfT spot counts."</p> <p>Note the suggestion here made by HE/NH that the DfT counts on the M67 are "spot counts". This not how I imagine ATC's to work. Are HE/NH claiming here that the DfT instal ATC's one day and take them away the next? Or do they stay there for a week? Or are they installed intermittently? Such details are necessary if we are to accept HE/NH implicit claim that the DFT counts can be ignored at this examination.</p> <p>The ExA and stakeholders must remember that a lot is riding on HE/NH's claim that the DFT counts, which show traffic levels far higher than HE/NH 2015 and 2025-DM, are so inaccurate as to be irrelevant.</p> <ol style="list-style-type: none"> 2. HE/NH refer their readers to the Webtris data which they collect. However they provide no helpful link to guide the inquisitive reader who wishes to scrutinise what they say. I went a-googling to find this data and gave up after 15 minutes and I am an experienced researcher. 	<p>There are no anomalies in the traffic modelling and no traffic in the model can disappear. All traffic enters or leaves the road network at the zone loading points (trip origins or destinations/trip attractors or producers) and travels through the road network between the different zone loading points. This is a fundamental prerequisite for the model build and its functionality. The model is calibrated against observed peak hour traffic flows, not Annual Average Daily Traffic flows (AADT), such as Department for Transport (DfT) count point data.</p>

Reference	IP Issue	NH Response
	<p>3. HE/NH write, in para. 3: "The daily traffic flows used in the assessment of the Scheme are derived by factoring up these peak period flows." I assume this is a typo, as it makes no sense. It should read "the flows at these different periods"</p>	
9.84.20	<p>IP response in reference to 9.69.115. Well well! We inch nearer to the truth. Nearer but not quite all the way there. Three points: 1. A628 Market Street. Here the flows are consistently higher than in Tintwistle. Here are the details: "So at Tintwistle, the DM-2025 flows are predicted to be 6250 (39.2%) lower than the flows at Hollingworth Market Street just a few hundred yards to the west on a continuous road with no major junctions, while the DS-2025 flows are predicted to be 5240 (33%) lower. The DfT figure for the same locations is a gap of 2884 (19.8%) (slides 14 & 18") source: REP5-040 referring to REP5-039 In the words of Bob Dylan "And you know something is happening but you don't know what it is" But now HE/NH have spilt the beans at last. The large gap in flows between Hollingworth and Tintwistle is now explained by them as traffic arising in Glossop and Hadfield. (HE/NH also mention Hollingworth and Tintwistle as sources for these large gaps in flow, but these settlements are too small to generate the numbers in question.) 2. National highways write: "This additional traffic demand is predominantly for journeys to and from destinations to the west." So it now appears that far from being a road designed to make a difference to journeys between Manchester and Sheffield what the road actually does is promote journeys by road from Hadfield and Glossop westward towards Manchester. This is hard if not impossible to reconcile with government policies designed to reduce traffic and encourage public transport and active travel in urban areas especially as the area is well served by rail. 3. the explanation given by National Highways for the huge flows predicted by the model in Glossop High Street East (15,600 in 2025-DS) is a complete nonsense. They just cannot be due to motorists from Hadfield and Glossop seeking to go westwards towards Manchester as a glance at the map would show NH. Some can, but not at this scale. So these flows remain unexplained.</p>	<p>See first part of response to 9.69.114 above.</p>
9.84.21	<p>IP response in reference to 9.69.119. Three points 1. The ExA and other readers should note that HE/NH do not respond to my point that they failed to inform the public of the increases in traffic on Shaw Lane and Dinting Road and other distributor roads in Glossop as well which were built into their plans for the A57 Link Roads, and that therefore the consultation in 2020 was built on false foundations. I am in the process of asking the ExA to remedy this shocking state of affairs. Zzz PI Act?? 2. The applicant says that the increase in traffic on Shaw Lane and Dinting Road is due to motorists avoiding delay and congestion on the A57 from Brookfield towards Glossop High Street. What they do not say is that this problem of rat running is, according to the Applicant, due to be increased by around 25% because of this scheme (4600 more vpd at Brookfield Road, see REP5-039, slide 31) 3. there was much discussion at ISH3 of how to handle the very difficult problems at Shaw Lane junction with the A57, problems which will be exacerbated by this scheme. The choice is between one bad solution and another. So sad when a sensible transport solution for the area would replace bad solutions with good ones.</p>	<p>There is a greater increase in the forecast displacement of traffic from the main road network to unsuitable alternative roads across the wider area without the Scheme compared to with the Scheme, just with less traffic growth along the A57 Corridor. The traffic modelling for the Scheme has been undertaken with the optimisation of the traffic signal timings at the A57/Shaw Lane junction included in the Do-something scenario.</p>

Reference	IP Issue	NH Response
9.84.22	<p>IP response in reference to 9.69.121 and 9.69.130.</p> <p>9.69.121: To find which chapter of the ES might deal with severance, I went to the ES Non-technical Summary, expecting to be signposted to the different chapters. No such luck! And there was no reference to this meaning of severance (difficulties in crossing roads due to traffic) in the entire summary. However, as I was looking, I came across this statement about the impact of the scheme on pedestrians (on page 35): "Reductions in traffic on local roads and the provision of new and improved walker, cyclist and horse rider facilities in the form of shared footways, bridleways and cycleways would provide improved and attractive pedestrian, cycling and horse riding facilities that would have a positive effect on road safety in the area." Knowing what we now know, and what the writers of the summary knew when they were writing it, about the increase of traffic on many roads throughout Glossop, and the non-improvement of the situation for non-motorised users in Hollingworth and Tintwistle, I would say that this statement is not a fair summary of the impacts of this scheme. In addition to which, I do not call a cycle-and foot- way running alongside the Spur road carrying a predicted 21,000 vpd an "improved and attractive facility." Sounds more like a health hazard to me, and anyone with any care for their good health would not use it. And so, I try again! The "Index" has no index to key words, so . . . I try ES Chapter 12 as that seems to be the only chapter where severance might fit within the title. And indeed that is where it is considered. Most instances of the word concern severance of agricultural holdings or general severance affecting businesses. There are just two relevant references to severance defined as 'difficulty in crossing the road due to traffic' in the entire document of 149 pages. The first reference is this: "Schemes will also be expected [says the NPS-NN] to improve accessibility and inclusivity and reduce community severance" (page 5) And the second reference is this: 12.9.84 During the Operational phase, the Scheme would reduce community severance through the separation of local and regional traffic resulting in large reductions of traffic on the existing A57. This would have allowed the opportunity to make this stretch of road much more friendly to cyclists and pedestrians (across all groups) through improved facilities and crossings, public realm improvements and reduction in speed. This is anticipated to lead to positive benefits to health and wellbeing. If this is what the applicant means when he makes a claim that a subject – in this case severance – "has been assessed within the environmental statement" then his standards are abysmal. There is effectively no information whatsoever on the impact on severance of the scheme beyond the narrow confines of the DCO boundary, that narrow strip which the Applicant seems to think is all the "local area" that there is. I would suggest that this "assessment" of what the NPS-NN thinks is an important matter (see first quote from that document above) may be in breach of the 2017 Regulations.</p> <p>9.69.130: Ah, that black box again.</p>	<p>National Highways' conclusion for the Scheme assessment that the additional traffic on both the B6015 Norfolk Street/Woodhead Road, Cemetery Road, Park Road and Hadfield Road (Hadfield Alternative) and the B6015 Norfolk Street, Talbot Street, Dinting Road and Shaw Lane routes due to the Scheme does not result in any adverse effects significant enough to trigger the need for any mitigation has been arrived at using professional judgment based on the absolute forecast changes in traffic flows as predicted by the traffic modelling, which are relatively small.</p> <p>In accordance with DMRB LA 112, Chapter 12 of the Environmental Statement includes an assessment of the effects of severance on land use and accessibility receptors, as well as the effects of severance on a number of health determinants. The methodology for this assessment is described in section 12.3 of Chapter 12. It should be noted that the study area for land use and accessibility extends 500m from the DCO boundary. For this reason, the assessment reported in Chapter 12 does not include areas such as Tintwistle, Dinting Vale or Shaw Lane.</p> <p>The forecast changes in traffic flows on roads in Glossopdale due to the Scheme are insufficient to have a significant adverse effect on active travel routes. That is, while there are increases in traffic volumes, and consideration of the requirements of DMRB LA112 Population and Human Health shows that increases in traffic can be anticipated to have negative effects, these are not anticipated to be at a significant level. Consequently, National Highways does not consider it necessary for safer active travel routes to be delivered as part of the Scheme.</p>

Reference	IP Issue	NH Response
	<p>I remember well my shock at hearing at ISH2 the way that severance was viewed within some guidelines being quoted by one of the National Highways team, guidelines which came from the IEMA, and were being used as justification for their view that there was 'nothing to see here' and nothing needed to be done.</p> <p>So shocked was I and incredulous, that I checked out these guidelines.</p> <p>I know that I have written this in some submission or other but I can remember it well. The IEMA website gave the impression of an important and well-respected organisation.</p> <p>The guidance being referred to by NH was the oldest guidance issued by the IEMA which was still extant, and it was being reviewed, so clearly it was regarded as being in need of a refresh. A slight pinch of salt required then!</p> <p>We know that there are large percentage increases and large absolute increases in traffic being predicted for some of these roads. As I have argued elsewhere, and I believe as NH have agreed, these increases will be bunched and not evenly spread. The busiest times will remain the busiest times but they will be even busier with all that that implies.</p> <p>I would respectfully suggest that the ExA insists that the work done by NH on all the impacts of the increases in traffic in Glossop, including of course severance, be published to the inquiry so that all concerned can review it. Request to ExA</p> <p>Nothing else will do if the ExA is to carry out their duty of assessing the adverse impact of this scheme as per the Planning Act section 4 subsection 7 and NPS-NN paragraph 4.3</p>	
9.84.23	<p>IP response in reference to 9.69.126.</p> <p>The answer given by HE/NH here about HGVs gives us the one fact that the proportion of HGVs in traffic flows will remain roughly the same with the scheme as without it. All the other very salient issues around HGVs which I raise are ignored in HE/NH's response just as they are ignored in the TAR.</p> <p>Here are these salient issues:</p> <p>What are the overall trends in HGV numbers and behaviour?</p> <p>What are the specific impacts which HGVs impose on people and buildings and environment, in particular when they form such a high proportion of the traffic flow?</p> <p>Of the additional traffic which will be attracted into this area by the scheme what percentage will be HGVs and what are the absolute numbers involved?</p> <p>Given that HGV removal was the top policy measure for the public in the Longdendale Transport Strategy Consultation in 2010, what are the available policy measures to reduce their number or to remove them from this area altogether?</p> <p>Is there any robust evidence about the behaviour of HGVs when faced with congestion on a major route and how likely are they to divert onto less suitable at perhaps quicker ways of reaching their destination i.e. rat runs? (this is of course a vital question for the Shaw Lane junction discussion)</p>	<p>The routes chosen in the traffic model by heavy goods vehicles (HGVs) and other commercial vehicles are influenced more by their vehicle operating costs, which are higher compared to other vehicles, such as cars. Consequently, HGVs and other commercial vehicles are less likely to reroute in response to small improvements in journey times, unless the benefits outweigh higher vehicle operating costs associated with any greater distances.</p>
9.84.24	<p>IP response in reference to 9.69.128.</p> <p>Once again, NH wants us all to take the outputs of their black box on Trust. There are a number of problems with this.</p> <p>1. The overall credibility of National Highways. I do really want to write a submission covering this matter in depth but for now I can briefly say that I believe that their track record is one of missing and misleading information. This feeds in to the way we consider all the matters below.</p> <p>2. The issue of the surplus traffic in Hollingworth and in Glossop High Street East has to be resolved. Where does this traffic go to and come from? (not forgetting the Mottram Market Street Mystery, which NH have still not addressed)</p>	<p>Regarding point 2, see first part of response 1.2.2 (9.69.114) above. Regarding point 4, the traffic model assigns traffic to the road network based on the most beneficial route for the users, which is established from a combination of journey time costs and vehicle operating costs, until model equilibrium is reached. Regarding point 5, the element of journey times within Manchester and Sheffield are excluded from the calculation of journey time savings because the Scheme is highly unlikely to alter journey times within these two cities.</p>

Reference	IP Issue	NH Response
	<p>3. The additional 7500 vehicles per day which come into and go out of this area at the M67 junction were the scheme to be built, will add to congestion and delay. It is hard to believe a narrative of general and large-scale time savings in this scenario.</p> <p>4. So for example there will be additional traffic on the narrow A628 from the Gun Inn junction onwards to the East, and the more traffic there is the more chance of breakdown, accident, and delay. Meanwhile down on the A57 on Brookfield Road the additional 4500 vehicles per day will either carry on down the already congested A57 or they will end up, encouraged or not by junction design and signage, avoiding that congestion and with it the potential legal problems in Dinting, diving into the side streets of Glossop, whereupon the model will tell us how much delay can be expected.</p> <p>But remember, the model "wants" the traffic to "come this way", and not stay on the A57, so the temptation will be there to understate delays.</p> <p>5 And perhaps the biggest problem is that the delays WITHIN the two ends of the journey, Manchester and Sheffield, have a greater influence on the eventual journey times than the bypass of one junction in Mottram . . .</p> <p>And so the question remains, is all this trauma worth it?</p> <p>And we have not got to reliability yet . . .</p>	

14. REP9-045 Daniel Wimberley - Comments on the Applicant's response to Deadline 6 submissions

Reference	IP Issue	NH Response
9.84.25	<p>IP response in reference to 9.70.29. Best news I have heard for a long time.</p> <p>1. From the context I do assume that NH in their reply are talking about an assessment of the scheme's impacts in Glossop. I just want to be sure that we are all singing from the same hymn sheet and that National Highways are not talking about some other, more general, assessment.</p> <p>2. It is fine IMO for there to be no laid down thresholds for some of these effects and that their importance will be estimated by people using their professional judgement. I do not see this as contradicting the requirement in the Planning Act 2008 and the interpretation of it in NPS-NN paragraph 4.3 that adverse impact be assessed. (in fact I believe that the thresholds and limits can be used in such a way that they get in the way – what the Act calls for is a weighing up of ACTUAL adverse impact of the scheme against its benefits)</p> <p>Provided that there is an element of challenge during the Examination to help the ExA to make a reasoned determination of the issues involved for their report to the Secretary of State then it should be possible to meet the requirement of the Act.</p> <p>Please can the ExA request the release of the full assessment? Request to ExA</p>	<p>See responses to 9.69.121 and 9.69.130 above.</p>
9.84.26	<p>IP response in reference to 9.70.30.</p> <p>About the modelling: It is good that the model recognises that there are three parts to the day: morning peak evening peak and inter peak. However as I know from a past life, there is something called the rush hour which is completely different from the periods before and after even though in National Highways' schema they would all count as being part of the same time period. This really matters when we are talking about impacts of all kinds arising from traffic - the most obvious instance of this being the journey to school.</p> <p>About the busses: The figures which NH are now offering give reductions in journey times on the 341 and increases in the 237. This is plausible.</p> <p>However, the matter of journey times around Glossop's distributor roads has now become a critically important matter, as it determines the whole debate around traffic routing at the Shaw Lane junction. So the model should be put under intense scrutiny.</p> <p>In addition there are unresolved questions around "where does the traffic go?" both in Hollingworth and at Glossop High Street East. (see above, my response to 9.69.115)</p> <p>The jury is out on any verdict on changes in bus times if the scheme were to be built, until these two matters are resolved. The first one involves detailed consideration of how the model actually works and if the predicted journey times are robust. The second would make clear, finally, what additional traffic flows we are really talking about.</p> <p>On not ignoring the baseline traffic figures: It is important that the background growth in traffic, even though it is present in both the figures for Do-Minimum and the figures for Do-Something, is nevertheless made clear as a separate component in what is going on, in people's lived daily experience. We all need this information in order to make informed choices about how to handle this issue of traffic and transport and getting to where we want to go without doing harm, and that includes whether or not to build this scheme..</p> <p>I know that the intention of always comparing Do-Something to Do-Minimum is to isolate the difference that the scheme makes but actually everyone is getting a false picture of what is going on and that can only lead to bad decisions.</p> <p>I say it again: there should be some way of making it visually clear that the Do-Something increase over the Do-Minimum is just a part of the overall increase which would affect</p>	<p>See response 9.69.114 above. Future forecast traffic flows without the Scheme (Do-minimum scenario) are presented in Section 4 of the Transport Assessment Report (TAR) (APP-185).</p>

Reference	IP Issue	NH Response
	<p>people's lives under NH's Business-as-Usual policies. Worth noting, of course, that these are not the government's policies, not any more.</p>	
9.84.7	<p>IP response in reference to 9.70.32. I think that this is the first explicit acknowledgement on the part of HE/NH that traffic does increase on roads "in the vicinity of the scheme," and this acknowledgement is to be welcomed. I don't think that this is what the public were led to believe during the public consultation in November 2020 This response of National Highways claims that traffic has redistributed but that overall demand has not increased. Two comments: 1. I have not focused on this during this examination but a little something in the back of my mind tells me that when new capacity is built then extra traffic is the result. This is understandable as a new road acts as one vast advertising hoarding for itself. That is one of the reasons why building new capacity, with the shock value of its construction, followed by its shiny new appearance across the landscape, is likely to have a negative impact on people taking up active travel and public transport options. But I need not be so hesitant. I do believe that National Highways have already conceded that the road will generate new demand in the settlements around it! I remember clearly that somewhere they have "explained" the bubble of extra traffic in Hollingworth and the other bubble in Glossop High Street East, by saying that the new road would create new demand for road journeys going WEST! 2. Then there is the reminder of the shocking revelation made during this Examination that traffic will be attracted to a corridor running across a National Park from roads as far away as the M62 in the north to the A623 / A6 in the south. This is the exact opposite of government policy on national parks which is that traffic be encouraged away from a Park. A comment on the model is in order. The response here of HE/NH to my original statements in the left hand column ignores what I say about them not opening up the model to scrutiny. I repeat my central complaint: "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" It's black box syndrome again, and it is unacceptable. I request the ExA to ensure that the workings of the model are made clear to this examination. Only then can we / you arrive at an informed understanding and then assessment of the adverse impact of the scheme. At the moment there are many outstanding issues and unverifiable claims. HE/NH cannot be allowed to be uncooperative on this. I would add that this is a minimum request. There should be a full independent review but disclosure is in my view legally mandated. Request to ExA</p>	<p>There are no anomalies in the traffic modelling and no traffic in the model can disappear. All traffic enters or leaves the road network at the zone loading points (trip origins or destinations/trip attractors or producers) and travels through the road network between the different zone loading points. This is a fundamental prerequisite for the model build and its functionality. The traffic model assigns traffic to the road network based on the most beneficial route for the users, which is established from a combination of journey time costs and vehicle operating costs, until model equilibrium is reached.</p>
9.84.28	<p>IP response in reference to 9.70.34. On not ignoring the baseline traffic figures: It is important that the background growth in traffic, even though it is present in both the figures for Do-Minimum and the figures for Do-Something, is nevertheless made clear as a separate component in what is going on, in people's lived daily experience. We all need this information in order to make informed choices about how to handle this issue of traffic and transport and getting to where we want to go without doing harm.</p>	<p>Future forecast traffic flows without the Scheme (Do-minimum scenario) are presented in Section 4 of the Transport Assessment Report (TAR) (APP-185).</p>

Reference	IP Issue	NH Response
	<p>I know that the intention of always comparing Do-Something to Do-Minimum is to isolate the difference that the scheme makes but actually everyone is getting a false picture of what is going on and that can only lead to bad decisions.</p> <p>I say it again: there should be some way of making it visually clear that the Do-Something increase over the Do-Minimum is just a part of the overall increase which would affect people's lives under NH's Business-as-Usual policies. Worth noting, of course, that these are not the government's policies, not any more</p>	
9.84.29	<p>IP response in reference to 9.70.37.</p> <p>Best news I have heard for a long time. Brief Summary: When are we going to see this assessment?</p> <p>1. From the context I do assume that NH in their reply are talking about an assessment of the scheme's impacts in Glossop. I just want to be sure that we are all singing from the same hymn sheet and that National Highways are not talking about some other, more general, assessment.</p> <p>2. It is fine IMO for there to be no laid down thresholds for some of these effects and that their importance will be estimated by people using their professional judgement. I do not see this as contradicting the requirement in the Planning Act 2008 and the interpretation of it in NPS-NN paragraph 4.3 that adverse impact be assessed. (in fact I believe that the thresholds and limits can be used in such a way that they get in the way – what the Act calls for is a weighing up of ACTUAL adverse impact of the scheme against its benefits)</p> <p>Provided that there is an element of challenge during the Examination to help the ExA to make a reasoned determination of the issues involved for their report to the Secretary of State then it should be possible to meet the requirement of the Act.</p> <p>So, please ExA, ask for this assessment to be released to this Examination in full. Request to ExA.</p>	See responses 9.69.121 and 9.69.130 above.
9.84.30	<p>IP response in reference to 9.70.39.</p> <p>This response is a little bit confusing, but If I understand this correctly, that is excellent news. It will make for a better assessment. Sorry to go on a bit, but when do we get to see it?</p>	Forecast changes in hourly traffic flows on several roads, including A57 Snake Pass, A628, Dinting Road and Shaw Lane, have been provided by National Highways during the DCO examination. Also see responses 9.69.121 and 9.69.130 above.
9.84.31	<p>IP response in reference to 9.70.40.</p> <p>I don't think we should accept this statistical inevitability approach. I think it may lead to accidents!</p> <p>To reduce accidents over a network, in addition to the three over-arching methods of acting on drink-driving, street lighting and speed control, you do serious work on logging them as they occur, analysing their causes, and taking effective action to reduce or eliminate them. The same methods apply if by an intervention you are changing traffic flows.</p> <p>However there is another approach applicable in settlements which is virtually guaranteed to reduce accidents and that is to remove conflict between people and vehicles by having pedestrianised areas or traffic free zones. In areas where this is not possible, severity as well as frequency is reduced by having area wide 20 mph speed limits, but the first option has great co-benefits..</p> <p>Wonderful! It is going to happen! (see left hand column) I hope . . .</p>	The Scheme incorporates improvements for non-motorised users, including additional segregated facilities that will reduce conflict between vehicles and non-motorised users. The sections of the A57 that will be by-passed by the new link road will also be traffic calmed, with potentially 20mph speed limits, and will effectively become low traffic zones where conflict between vehicles and non-motorised users will be very substantially reduced.
9.84.32	<p>IP response in reference to 9.70.42.</p> <p>So many things here!</p> <p>1. The scenario presented in the first sentences of National Highways response is kind of plausible. What the reader may not notice but is implicit in these sentences is that this mode of thinking operates in a policy vacuum, or rather there is one policy, and that is "predict and provide."</p>	The Scheme incorporates an extensive package of improvements for non-motorised users, that will encourage walking and cycling for local trips, and does not preclude the future introduction of improved public transport services. Regarding point 2, the model is calibrated against observed peak hour traffic flows, not Annual Average Daily Traffic flows (AADT), such as Department for Transport (DfT) count point data. Regarding point 3, see response 9.69.114 above.

Reference	IP Issue	NH Response
	<p>This policy is completely inappropriate in a time of climate crisis and in fact our government has recognised this and every other strand of transport policy apart from the roads programme is directed towards limiting traffic by encouraging transfer to walking, cycling, bus and rail.</p> <p>This will simultaneously alleviate all the problems of the area related to traffic.</p> <p>2. National Highways argue that because the network is operating close to capacity, traffic flows cannot increase between the 2015 baseline and the Do-Minimum 2025.</p> <p>Firstly, most of the time, the network is operating within capacity and secondly the figure for 2019 at the M67 junction, which is based on a DfT automatic traffic count, is far higher than the 2015 baseline figure, which gives the lie to the claim that the network 'can't take any more.'</p> <p>3. Even if National Highway's second paragraph is correct in saying that the additional traffic will find its way along unsuitable roads, the vast bubbles of traffic in Hollingworth and Glossop High Street East remain as question marks over the model. We await a plausible explanation from National Highways</p>	
9.84.33	<p>IP response in reference to 9.70.43.</p> <p>The response referred to contains the following statement: "A6013 provides a link between the A6187 and the A57 that runs in a north-south direction and therefore, the Scheme is not forecast to result in traffic re-routing along the A6013 through Bamford, as there will be no journey time benefits in using it for east-west journeys across the Pennines that the Scheme provides for."</p> <p>Very strange as we have learnt in this examination that around half of the additional traffic on the Trans-Pennine corridor somehow reaches it from the A623/A6. One route up from that road to the corridor is through Bamford.</p> <p>What National Highways are saying about traffic in Bamford increasing by - 1% when the traffic over Snake Pass increases by 38% is that all the increase in traffic (going Eastward) will go straight through to Sheffield and not turn right at the Ladybower reservoir junction. We would need to know the turning movements as they are now at the T-junction on the reservoir but I very much doubt if basically no traffic at all going eastward turns right at the Ladybower Junction to go through Bamford.</p> <p>It is another instance of where a clear explanation would be helpful to everyone. The impacts on Bamford could be severe in terms of severance noise vibration danger, but we just don't know as things stand. Also of course at stake here is the credibility of the model itself.</p>	<p>National Highways does not dispute that currently there is some traffic that turns onto or off the A57 at its junction with the A6013 that runs through Bamford. However, the traffic modelling indicates that although traffic is forecast to increase on the A57 with the Scheme compared to without it, this does not result in a corresponding significant change in traffic flows on the A6013 through Bamford.</p>
9.84.34	<p>IP response in reference to 9.70.44.</p> <p>Glad to hear this. Please confirm that the peak of the peak which you have taken really is that by saying which day of the week it is?</p> <p>I said that it might be more than 2 or 3 per minute implying that 2 or 3 per minute each way was 'not that bad' – but actually that is already enough to make crossing the road appreciably more difficult. 6 extra movements per minute is one extra vehicle every 10 seconds.</p> <p>But it is good that you are taking real peaks into a/c</p>	<p>The traffic modelling is based on a representation of an average typical weekday and does not represent a particular day of the week.</p>
9.84.35	<p>IP response in reference to 9.70.47.</p> <p>Thank you for this clear and revealing response. The ever-increasing road traffic predicted and then enabled by the Department for Transport does indeed lead to worse impacts in the future whether or not the scheme is built.</p> <p>The first thing to do is to raise awareness that this is so not by concealing the background increase in traffic and its effects on our lives, but by including it in all presentations about transport, including the consultations and publicity around this scheme and others like it.</p>	<p>Future forecast traffic flows without the Scheme (Do-minimum scenario) are presented in Section 4 of the Transport Assessment Report (TAR) (APP-185).</p>

Reference	IP Issue	NH Response
	<p>And the second thing to do is that government policy has to change radically both in order to tackle climate change and in order to increase the well-being of all citizens especially those living in urban areas.</p> <p>And that is precisely what has happened, government policy has changed radically, and it follows that this scheme is now obsolete and will have to make way for better solutions.</p>	

15. REP9-046 Environment Agency - Comments on the ExA's schedule of changes to the draft Development Consent Order and comments submissions made by the Applicant for Deadline 6 and 8

15.1. EA Commentary – ExA Changes to Draft Development Consent Order (20th April 2022)

15.1.1. Summary of key points made by Interested Party: The representation made by the Environment Agency (EA) at Deadline 9 recorded the meetings that had been held between National Highways and the EA. It proceeded to provide updates in relation to certain matters, comment on a number of requirements and identified where dialogue was continuing between National Highways and the EA.

15.2. National Highways' response

15.2.1. National Highways and the EA have continued to engage in relation to the wording of the requirements in the dDCO and good progress has been made. The only wording which is currently the subject of ongoing discussions is requirement 6 with National Highways and the Environment Agency being addressed and discussions regarding the wording which can be agreed for the requirement. This response does not repeat the submissions and simply updates on the progress that has continued to be made since Deadline 9.

15.3. EA Commentary – Deadline 8 [REP8-007] Flood Risk Assessment

15.3.1. Summary of key points made by Interested Party: Again, the representation made by the EA at Deadline 9 recorded the meetings that had been held between National Highways and the EA to discuss the Flood Risk Assessment.

15.4. National Highways' response

15.4.1. The representation is an accurate account of the discussions and will be captured in the final submission of the Statement of Common Ground (SoCG).

15.4.2. Following ongoing discussions that have taken place between the Applicant and the EA since Deadline 8, the Applicant's Deadline 10 submission includes an amended Register of Environmental Actions and Commitments (REAC), which has been updated at Action RD1.21 in response to comments received from the EA. In addition, the FRA has been resubmitted due to minor amendments being required following comments received by the EA.

15.5. EA Commentary Deadline 8 [REP8-014] – 9.50 Outline Landscape and Ecological Management and Monitoring Plan

- 15.5.1. Summary of key points made by Interested Party: The EA confirm that they have reviewed the Outline Landscape and Ecological Management and Monitoring Plan (LEMP) submitted under Deadline 8 and consider that this is acceptable for the purpose of the first EMP submission. The EA note in LE3.1 Ornamental amenity shrub mix list, the potential proposed use of cherry laurel (*Prunus laurocerasus*) and snowberry (*Symphoricarpos x chenaultii*), and recommend that it is avoided in the detailed landscape strategy.

15.6. National Highways' response

- 15.6.1. The Applicant noted this response with respect to the ornamental shrub mix. The EA will be consulted on the Detailed LEMP, and at which point the final seed mix will be agreed following this and any other comments received at the time.

16. REP9-047 National Grid Electricity Transmission Plc - Update on engagement with the Applicant

16.1. National Grid's submission at Deadline 9

- 16.1.1. *“NGET and the Promoter are continuing to liaise in relation to the protective provisions and an additional side agreement required to protect NGET's land, rights and apparatus. Progress is being made and NGET are hopeful that matters will be agreed by the next deadline. We will keep the ExA informed of progress.”*

16.2. National Highways' response

- 16.2.1. National Highways and National Grid have agreed the Protective Provisions appearing in Schedule 9 Part 4 of the draft Development consent Order. The wording of the side agreement has also been agreed since Deadline 9 and is currently being prepared for execution by each party. Upon completion of the side agreement both parties will provide an update to the Examining Authority.

17. REP9-048 National Trust - Comments on the Report on Implications for European Sites

17.1. Question in 2.2.9 of the RIES

17.1.1. Summary of key points made by National Trust: The National Trust does not have outstanding concerns about impacts on the South Pennine Moors SAC in relation to the construction phase.

17.2. National Highways' response

17.2.1. No response required.

17.3. Table 3.3, p21-23 of the RIES

17.3.1. Summary of key points made by National Trust: National Trust notes that according to the RIES, PDNPA has raised concerns about confidence limits in traffic data used to screen out effects on the A628 and that CPRE supports this view. In their Written Representation [REP2-079] National Trust discussed issues of landslip and road safety on the A57 Snake Pass which have resulted in road closures in the past. While National Trust is not in a position to comment on the detailed traffic modelling submitted by the Applicant or other Interested Parties, they consider that unless the reliability of the A57 Snake Pass (a known issue) has been accounted for in the traffic modelling, then a prudent approach would be to include the A628 in the HRA Screening Assessment.

17.3.2. A second area of uncertainty that has emerged during the Examination relates to the probable need for traffic restraint measures on the A57 Snake Pass to address road safety issues. The impact that this will have on traffic levels on the A57 and A628 is not known.

17.3.3. Finally, National Trust note that in the RIES there are outstanding questions about possible additional source impact pathways for SAC qualifying features referred to at paragraphs 2.2.11 and 2.2.12, which should be factored into the HRA assessment if necessary.

17.4. National Highways' response

17.4.1. With respect to land slip issues, it should be noted that in Derbyshire County Council's Response to the Examining Authority's second written questions (REP6-026), they confirmed that structural failures of the A57 Snake Pass and A628 Woodhead Pass are primarily the result of the associated geology of the routes through which they pass and also climatic issues, particularly the increased occurrences of prolonged and heavy rainfall in more recent years.

17.4.2. With respect to road safety issue, National Highways are not proposing nor do the PDNPA support any traffic restraint measures on the A57 Snake Pass as part of the Scheme.

17.4.3. With respect to the outstanding question in paragraph 2.2.11 of the RIES, it should be noted that the air quality impacts of the Scheme on designated sites

have been assessed following DMRB LA105 Air Quality guidance, which is focused on the effect of nitrogen deposition as the primary pollutant of concern to qualifying habitats within designated sites. The assessment of the impact of changes to particulate matter associated with the increase in traffic on roads included within the air quality affected road network is not required by DMRB LA105.

- 17.4.4. Furthermore, there is limited general guidance on the assessment of the impact of particulate matter from road transport on designated sites nor on the assessment of likely significant effects on specific qualifying habitats. Recent publications on the impacts of air pollution designated sites, including the Institute of Air Quality Management (IAQM) guidance on the assessment of air quality impacts on designated nature conservation sites (2020) and Chartered Institute of Ecology and Environmental Management (CIEEM) Advisory Note: Ecological Assessment of Air Quality Impacts (2021) do not cover assessment of the impact of particulate matter.
- 17.4.5. The IAQM guidance on assessment of dust from demolition and construction (2014 v1.1) provide advice on receptor sensitivity, focused on particulate matter from construction activities, to determine appropriate mitigation measures but does not provide an assessment methodology for quantifying the impact of particulate matter on qualifying habitats within designated sites. Natural England's report "The significance of secondary effects from roads and road transport on nature conservation" (ENRR178, 1996) states that "*the impacts of dust and particulates on plants appear to be variable, and data is insufficiently comprehensive to draw any firm conclusions on the effects of road traffic particles on nature conservation*", while the English Nature Research Report "The ecological effects of diffuse air pollution from road transport" (ENRR580, 2004) concludes that "*little work has been undertaken on the specific effects of particulates arising from roads and vehicles, and studies have focussed on physical injury and growth reduction (Farmer, 1993). It is likely that the wider impacts of particulates and dust deposited on vegetation away from the verge are likely to be small or insignificant.*" Finally, it is worth noting that there is no published information is provided on the sensitivity of qualifying habitats to particulate matter on the Air Pollution Information System (APIS) website, as it is not considered as a main pollutant of concern in relation to habitats.

17.5. Question in 3.3.3 of the RIES

- 17.5.1. Summary of key points made by National Trust: As a result of the issues and uncertainties referred to above that have been raised during the course of this Examination, National Trust lacks confidence in the outcomes of the HRA. Specifically, the National Trust is not able to accept the Applicant's conclusions that there would be no likely significant effects to the qualifying features of the South Pennine Moors SAC from habitat degradation through adverse changes in air quality along the ARN during operation (or from those matters raised at 2.2.11 and 2.2.12 of the RIES), because we consider that additional information is required to support this conclusion.

17.6. National Highways' Response

17.6.1. National Highways has previously responded to the above points, for example through paragraphs 8.6.1 within the Applicant's response to PDNPA's Local Impact Report (REP3-028), Item 5 of the Written summary of Applicant's case at ISH2 (REP4-008), and the response to Q12.3 of Applicant's responses to Examining Authority's Second Written Questions (REP6-017). National Highways maintains its position on the approach to assessing the potential for likely significant effects to the qualifying features of the South Pennine Moors SAC from habitat degradation through adverse changes in air quality along the ARN during operation.

17.7. Question in 3.3.7 of the RIES

17.7.1. Summary of key points made by National Trust: National Trust has no comments to make in relation to Table 3.4.

17.7.2. In relation to Table 3.5 on page 30 of the RIES, the National Trust request changes to the table.

17.8. National Highways' Response

17.8.1. Please see National Highways' response at 17.6.1 above. National Highways has nothing to add to its previous responses.

18. REP9-049 Peter Simon - Comments on submissions for Deadline 8

Reference	IP Issue	NH Response
9.84.36	<p>2. I understood from the ISH3 that the Examination had commissioned (- at whose and what cost unknown? -) the suggestion of a "Select Link Analysis" for the DCC LIR A57 bottleneck Junction 3 at Shaw Lane. This to be undertaken by the following authorities jointly; DCC, NH and HPBC. The junction operation here being central to the assumption of the Scheme model for traffic to avoid the A57 through central Glossop and its AQMA.</p> <p>Also according to DCC (REP8 – 023) further work may be undertaken regarding traffic signal optimisation on the A57 around the general Brookfield vicinity though I understood the model already included this? Initially at the ISH3 the DCC representative proposed a "Select Link Analysis" but this may have morphed to mean something else? Such as an exploration of further "Signal Optimisation" or a "sensitivity test"? Its hard to be sure from their latest D8 submission. Also (REP8 – 025) High Peak record that there are to be discussions between parties about further "sensitivity tests".</p> <p>Actually its all fairly unclear what is being considered between the statutory parties here! Not really satisfactory when the findings and outcomes are committed apparently for the next Deadline 9 of 27 April which is very late for scrutiny.</p> <p>Whilst hopefully work of evidential value it seems apparent that to understand the related local network traffic in the area it is inconsistent to simply examine one route in detail, without the outcomes being similarly known on associated local routes, including the now acknowledged "Hadfield Alternative" (REP8 – 018) (Deadline 8 Submission - 9.74 Comments on Deadline 7 submissions P60 - Part 2 of Response to REP7- 042 Peter Simon RE "The A57 and North Glossopdale - incomplete traffic modelling for filtering traffic").</p> <p>The approach here lacks consistency, and can only really be at best inconclusive because it excludes the overall detailed modelling I advocated. Modelling for example that would identify the threat to the villages of Hadfield, Padfield (and by extension Old Glossop) shown in the DCC LIR.</p>	<p>2. Select link analysis for the Dinting Road/Shaw Lane corridor has been submitted by National Highways at deadline 9 (REP9-029). This shows where traffic using the Dinting Road/Shaw Lane corridor has come from and is going to across the road network for both the Do-minimum and Do-something scenarios. This is not to be confused with the separate matter regarding the operation of traffic signals and signal timing optimisation. No improvements are proposed as part of the Scheme at the A57/Shaw Lane junction other than optimisation of the signal timings. Neither does the Scheme include any proposal for the linking or coordination of signal operation at the A57/ Shaw Lane junction with that at other junctions on the A57, which would be a matter for DCC as highway authority for this section of the road network.</p> <p>The traffic modelling for the Scheme has been undertaken at an appropriate level of detail and in a consistent manor, including roads in Glossopdale that offer potential alternative through routes for traffic to the A57.</p>
9.84.37	<p>3. What is known, is that without a Scheme (ie, in a "Do Minimum" situation) the modelled traffic increases under study simply would not arise wherever the travel was between. Similarly the signal optimisation consideration where last minute proposals are anticipated, will be unlikely to impact much as the traffic growth levels remain contained. Whatever these further studies find or propose it remains strongly probable to a point of certainty that if the capacity does not safely exist to accommodate the LIR Junction 3 Shaw Lane diversion as proposed the model supporting the Case for the Scheme is no longer intact. That has obvious implications for the Application.</p>	<p>3. Traffic growth is not contained without the Scheme. There is a greater increase in the forecast displacement of traffic from the main road network to unsuitable alternative roads across the wider area than with the Scheme, just with less traffic growth along the A57 Corridor. The traffic modelling for the Scheme has been undertaken with the optimisation of the traffic signal timings at the A57/Shaw Lane junction included in the Do-something scenario.</p>
9.84.38	<p>4. At WQ2 (PD – 012) the ExA asked the Applicant if they had considered these implications regarding the viability of the Scheme. The Applicant have advised at D8 (REP8 – 018 as above) they had conducted a Worst Case Scenario assessment maintaining an ongoing belief over the safety of the AQ position contrary to that of the LIR and HPBC. They seem here to rely fully on their original ES evidence and on the model's claim that local roads can accommodate increased traffic diversions of between 15% up to 50% on identified local streets or "rat runs". I continue to think as do others at the Examination that this is unrealistic and resolution of this point is I would have thought key to the survival of the Scheme's case</p>	<p>4. The National Highways conclusion for the Scheme assessment that the additional traffic on both the B6015 Norfolk Street/Woodhead Road, Cemetery Road, Park Road and Hadfield Road (Hadfield Alternative) and the B6015 Norfolk Street, Talbot Street, Dinting Road and Shaw Lane routes due to the Scheme does not result in any adverse effects significant enough to trigger the need for any mitigation has been arrived at using professional judgment based on the absolute forecast changes in traffic flows as predicted by the traffic modelling, which are relatively small.</p>

Reference	IP Issue	NH Response
	<p>as it presently stands. My case continues to be that AQMA remains potentially in need for assessment for unacceptable potential AQ infringements and exceedances and to reiterate the scheme modelling should without question extend down meaningfully to more of the Local Traffic Network in Glossopdale.</p> <p>It is still not clear, as further cost for studies does not seem a consideration, why this recommendation has been ignored. I note that NH in a response to me (at 6.2 P61 REP8 – 018) claim an assessment has been performed that concludes no detrimental impact on larger and lesser routes through the villages identified.</p> <p>“The impact and consequential effects of the additional traffic due to the Scheme on both the B6015 Norfolk Street/Woodhead Road, Cemetery Road, Park Road and Hadfield Road (Hadfield Alternative) and the B6015 Norfolk Street, Talbot Street, Dinting Road and Shaw Lane routes have been assessed by National Highways. The conclusion of this assessment is that the additional traffic on these roads due to the Scheme does not result in any adverse effects significant enough to trigger the need for any mitigation.”</p> <p>However they give no reference which rather undermines that assurance. Could I ask here formally therefore that NH be requested to supply at the earliest opportunity the exact reference(s) in their evidence on which this reply and assurance relies?</p>	
9.84.39	<p>5. Arising from the Examination process it now appears (REP8 – 023) that DCC mainly concede a controlled crossing intermittently halting traffic will be required on Dinting Road to protect schoolchildren in particular, rail commuters and other members of the public generally. Regrettably DCC response here is characteristically unhelpful for the Examination as it continues the pattern of ambiguity present at the ISH hearings, answering obliquely rather than directly. It requires close analysis to obtain what is however a sufficiently firm conclusion.</p> <p>Their Deadline 8 Submission initially reads as there being currently being no current requirement for a formal crossing below the rail station to the east on Dinting Road. At Page 5 it is said;</p> <p>“The County Council acknowledge that the applicant has provided some indication of potential changes in traffic flow on both Shaw Lane and Dinting Road together with a number of local roads in the area although the County Council does not consider on the basis of the information provided that there is likely to be numerical justification for the introduction of a controlled crossing at this stage necessitated by the scheme.”</p> <p>But then immediately that position is significantly qualified if not overturned, as an “update” since the Hearing reveals that, with senior level County Network Manager involvement “These discussions and further investigations have identified that the County Council has secured developer contributions funding for a controlled crossing on Dinting Road, which is to the left of Station Approach”. (P5).</p> <p>A County Highway Response then comments further and ultimately this confirms sufficiently the inevitability of the crossing:</p> <p>‘The Highway Authority has received several complaints about the crossing point on Dinting Road, including from the MP and a Glossopdale School Governor. The Transport Statement dismisses this road as not being “heavily trafficked” despite describing it as a key link between Glossop and Hadfield, an access to the rail station and being a main bus route. It is a well-</p>	<p>5. The Scheme does not result in increases in traffic flows along Dinting Road sufficient to trigger the need for any new controlled pedestrian crossings. When the assessment of the Scheme was undertaken there was no committed scheme that included a new pedestrian crossing across Dinting Road. Consequently, the traffic modelling for the Scheme does not include such a crossing. However, any controlled pedestrian crossing across Dinting Road in the vicinity of Dinting station is very unlikely to be called sufficiently frequently to result in any material impact on average hourly vehicle journey times along the Dinting Road/Shaw Lane corridor, since pedestrian demand will be very intermittent. Thus, inclusion of a controlled pedestrian crossing on Dinting Road in the traffic modelling would be highly unlikely to alter the forecast routing of traffic across the road network.</p>

Reference	IP Issue	NH Response
	<p>known and well used rat run in the town to by- pass the regularly congested A57 corridor. Bearing the latter and aforementioned complaints in mind, it's considered that any approval for expansion of the school should secure funding for investigation in to, and any subsequent installation of, a zebra crossing at this location." (P5)</p> <p>DCC's statement read as a whole leaves little doubt there will be a formal crossing of some sort at this location and the evidence* strongly suggests it will require signal enforcement that significantly halt the traffic. (*See Page 4 – "The Inspector noted also that it is in the vicinity of Dinting station, on a section of highway that is of poor horizontal and vertical alignment".)</p> <p>This is important in the context of the Examination because in a reply to me the Applicant makes the following acknowledgment of the consequence of such a development , which would be to significantly undermine the authority of the model, albeit with unknown consequences. (REP6-017 P61 7.4)</p> <p>For the routing of traffic across the modelled road network to significantly alter from that forecast by the traffic modelling, physical measures or schemes would need to be introduced onto the road network, such as changes in speed limits, traffic calming measures, additional traffic signals, etc., that would cause drivers to choose alternative competing routes. Any such proposed modifications to the road network would be subject to an impact assessment prior to their implementation that would need to consider the diversionary impact of the scheme on traffic and the consequential environmental effects. No such schemes for Dinting Road and Shaw Lane are proposed.</p> <p>Though the Applicant does not accept that this would necessarily mean consequences for the A57, it probably will, and consequences would also need to be assessed for impact elsewhere. So this is a situation with bearing on their model which now by the Applicant's own admission needs to be addressed in the light of the school expansion in progress and the extra burden of the Scheme's traffic on this road.</p>	
9.84.40	<p>6. Considering the matter cumulatively therefore the preferred diversionary route of Dinting Road envisaged in the modelling appears to be superseded by events. Specifically impediments to free flow on this route now realistically include</p> <ul style="list-style-type: none"> • An existing informal one way system currently enforced by motorist consent on Shaw Lane • Followed by a required future formal (zebra) crossing of some nature (probably requiring light controls for safety.) • Further interruptions to flow from multiple entrances/exits from sizeable new developments approved in the vicinity and extending along the entire route. (These are committed developments acknowledged by the NH model) • Also existing train station and associated private parking entrances/exits • There is photographic evidence for many of these circumstances before the Examination as supplied by Mr Bagshaw (REP2-089) <p>In a WCS modelled assessment these impediments must particularly be viewed in the context of congestion at peak times, notably the exit of children from school and the morning and</p>	<p>6. Junction delay is generally the most dominant factor in journey times across the modelled road network, rather than average speeds along roads. Journey times in the base model on key routes have been calibrated against observed journey times, therefore the impact of any on-street parking on traffic flows will inherently have been accounted for in the model. Consequently, the presence of on-street parking is not anticipated to result in any significant change in modelled journey times or effects on noise and air quality even with the forecast increases in traffic flows due to the Scheme. Also see National Highways response (7.4 - REP6-017).</p>

Reference	IP Issue	NH Response
	<p>evening “rush” hours. Any suggestion of only an additional 1 car per minute here as from the DCC current representative (REP8-023, P4) is I suggest totally disingenuous and dangerous. -“We see that on the roads in Glossop away from the A57 changes in flow of typically around 1000 movements daily. Over, say a 16-hour day, this equates to 60 an hour or one a minute, consequently, the County Council believes that changes in flows arising from the scheme are largely imperceptible” - .</p> <p>It is the peak period traffic that that halts flows, and leads to congestion, and so to the worst case scenario, not an average over 16 hours.</p> <p>To summarise irrespective of new studies and tweaks to traffic signals the evidence is likely to continue to show that the Case for the Scheme is no longer fully intact as the modelling regarding journeys diverting off the A57 falters under scrutiny. Furthermore the Applicant themselves acknowledges the implication of any new road infrastructure for the traffic model, in itself a potent argument for a remodel as it is reasonable to conclude the future zebra crossing on Dinting Road as a given.</p>	
9.84.41	<p>8. As I have consistently represented there is and has been a high scoring alternative on the table to be considered which has the advantage of buying time to make possible a new critically needed transport deal for Glossopdale and beyond. The traffic issues locally have never really been sifted or analysed for a solution other than major roadbuilding, so opportunities are being missed. A notable feature of Glossop’s spatial identity currently is its lack of public transport links and over reliance in that regard on a single rail line to Manchester. The Examination has demonstrated a marginalisation of bus transport over time and the shocking run down of its operation to make it a poor relation, even to the extent that apparently the NH model fails to take account of the Scheme’s impact on the option of bus trips. (Keith Buchan/CPRE generally, eg (REP7-036) When bus journeys simply require meaningful support to have the potential to be at least an indispensable equal public transport partner.</p>	<p>8. The Scheme does not preclude the future introduction of improved public transport services. The number of trips that could potentially switch from car-based to public transport, even with a very significant improvement in public transport provision, is unlikely to substantially alter forecast traffic growth outside of and between large urban towns and cities, which the Scheme is designed to accommodate.</p>
9.84.42	<p>9. Stations on the Hadfield/Manchester line tend to be casually cited in every application for development locally, whether large or small. Notably for example Tameside’s Godley Green Garden Village proposal for a completely new settlement of circa 10k persons (2.5k dwellings) significantly references passenger load expectations at Hattersley and Godley stations. An appropriate study of rail capacity at peak times would reveal the expectations for rail cumulatively are increasingly unsustainable, and need future proofing with alternative provision before it is too late and there is nothing left to the public but car travel by road. The current opportunity is thus a critical one.</p>	<p>9. Accommodating forecast future demand for rail travel is the responsibility of Network Rail and train operating companies.</p>
9.84.43	<p>10. The Scheme is neutral towards bus transport I would suggest, perhaps slightly negative it has been suggested , with regard to potential future usage. Whereas CPRE with Keith Buchan have suggested making the bus a favourable option. They identify a number of excellent opportunities to correct the imbalance in local transport provision and show how buses which could be electric - (for example swift single deckers that now exist with wi-fi and cardless payment) - are entirely compatible with today’s world. If CPRE are listened to then bus travel for individual journeys does not need to be the poor relation it has been allowed to lapse into; it can be the transport of choice given appropriate support of local and regional TAs. (REP2-070) CPRE Peak District and South Yorkshire Branch Deadline 2 Submission - Written Representation Appendix A - Car Free Low Carbon Travel for Longdendale and Glossopdale)</p>	<p>10. See response to 8 above.</p>
9.84.44	<p>11. Moreover Mr Bagshaw has suggested a possible option of a Mottram interchange within GMTS as an additional critical public transport link coupled with a one way gyratory around</p>	<p>11. The alternatives to the proposed Scheme considered by National Highways and the justification for their rejection are set out in Chapter 3 of the Environmental Statement (REP2-</p>

Reference	IP Issue	NH Response
	<p>Mottram. Such an offer would with time and investment open up enterprise and individual employment opportunities across the conurbation including the airport (with the caveat that only moderate air travel should be encouraged). Currently to journey to South Manchester by public transport involves a long trip into Manchester and then out again so numerous and mounting car journeys are now made on increasingly over loaded roads. An Interchange could be developed to offer a significant public transport offer to alter this unsustainable cycle of car dependency whilst creating new opportunities for enterprise and employment by good planning provision. It could service major appropriate housing in the area that otherwise will be mainly car dependent. This opportunity for change should be seriously considered I feel.</p>	<p>036) and item 9.75.34 in Applicant's written Summary of Issue Specific Hearing 3 (REP8-019).</p>
9.84.45	<p>12. Climate Change has been a major topic at the Examination but if the term "emergency" is not being lightly and gratuitously used this is realistically the last chance locally for a transitional transport deal towards something resembling a viable alternative to an quite unsustainable future. I would agree with Mr Bagshaw (foot of P3 REP8 -042) that it is a case of major opportunity, or gross failure, facing decision makers here.</p>	<p>12. The Applicants' comments on Deadline 8 submissions are set out in REP9-027.</p>
9.84.46	<p>This makes all the more compelling the need to establish to what degree a hybrid modal scheme with only a minimal road building component has been properly assessed by the DfT against the Scheme objectives. My reading and understanding of the documents available leads me to conclude this has not been the case and that it is perhaps the only viable solution here, which should be considered in full and in fact before this Examination concludes.</p>	<p>Please see the Applicant's written Summary of Issue Specific Hearing 3 (9.75.34 – REP8-019).</p>

19. REP9-050 Sharefirst My Journey to School - Comments on the ExA's schedule of changes to the draft Development Consent Order

Reference	IP Issue	NH Response
9.84.47	<p>Draft Development Consent Order</p> <p>1. We await the outcomes in the detailed written summary of findings from Planning Inspectorate Unaccompanied Site Inspection to Dinting. Reassurances have been given to SMJTS by the Case Team that an opportunity for the community to respond will be included within the formal Examination Process. We look forward to receiving details;</p> <p>2. SMJTS and Glossopdale School and Sixth Form extended an offer at Deadline 6 to host a Glossopdale School and Sixth Form Student Voice Forum, to be led and organised by TJ Fielding, School Governor in order to continue to enhance community engagement. We await to hear if this offer is likely to be taken up;</p> <p>3. Continuing to pick up a comment from Deadline 4: When will an Electric Vehicle trajectory for take-up be available to assist with the new Carbon Management Plan, carbon impact assessments, carbon budgets and help continue to secure and underpin delivery of the national commitments to Net Zero?</p>	<p>1. No response required as the comments are directed at ExA. However National Highways has noted that the Examining Authority has presented their Record of their Third Unaccompanied Site Inspection (EV-061).</p> <p>2. National Highways thanks SMJTS for the offer. This has been passed to the project communications manager who will explore the possibility of incorporating it in ongoing project engagement.</p> <p>3. National Highways are committed to a Carbon Management Plan for the Scheme (REP5-023), and as part of this there will be reporting of the carbon savings achieved throughout the construction stage. Output from the carbon model will report the embedded carbon emissions due to the construction to quantify the reductions. This data will draw upon the latest emission factors available at the time. The greenhouse gas emission calculations for the operational stage have been updated to use the latest emission factors available (Department for Environment, Food and Rural Affairs (Defra) Emission Factor Toolkit (EFT) (version 11) (EFT v11), which includes data relating to the UK vehicle fleet and associated emissions for the period between 2031 and 2050 inclusive (REP5-026).</p>
9.84.48	<p>Junction Operation and Signalling</p> <p>4. It would be helpful to us as a community interest group if it was please possible for the Applicant to summarise design, junction operation and signalling solutions which are included in the design of the A57 Link Roads Scheme to continue to support safe use and safe crossing of the new road layout for all ages and all mobilities of the community in safe journeys to school and safe journeys all year round at all travel times, particularly around the new road layout in areas of Hollingworth and onward travel from Glossop Spur Road through Dinting , surrounding villages, rat runs and onwards to Glossop and Snake Pass;</p> <p>5. Please can the Applicant advise what adjustments, investigations or additional measures have been identified as part of the A57 Link Roads Scheme proposals and delivery to help address the traffic flow distribution concerns identified by the additional modelling, in order to alleviate both the potential for predicted traffic flow increases via the new A57 Glossop Spur Road to Dinting (AQMA area), surrounding villages and knock on impacts onwards towards Glossop and Snake Pass, and the potential under-utilisation of the national strategic road network (A628 Woodhead Pass). We are also mindful that Tintwistle is an AQMA area;</p> <p>6. Are there any other future-proofing measures for user benefits with a new Glossop Transport Hub that can be considered as part of the Scheme, for continued regional integration in sustainable travel?;</p> <p>7. Locally we have observed new signage indicating new weight restrictions (7.5T) on Snake Pass following extensive land slippages in heavy rain. Are these likely to be permanent weight restrictions, and has impact to business been assessed?</p> <p>8. SMJTS has suggested consideration of inclusion of new community familiarisation training for new road layout, new road crossings, junction operation and signalling for all users as part of the scheme is included in project delivery. It is not yet clear if this is possible. Please can the Applicant advise is this is possible?</p>	<p>4. All pedestrian crossings are designed in accordance with the DMRB, TfGM design guidance and Inclusive Mobility, and will include the following features for all crossings:</p> <ul style="list-style-type: none"> • Tactile paving to guide users to the crossing locations • Proposed widths accommodate all users, and generally above the recommended minimum to allow extra space • Slope gradients around and between the crossings will be provided in accordance with the Inclusive Mobility guidance. • Rotating cones will be placed under all the push button units at controlled crossings to alert users when the crossing is safe to use. • Junction signals are optimised to ensure the maximum green time is provided to non-motorised users during signal phasing. This includes the provision of triangular islands to separate turning traffic from straight ahead traffic and allows the signal phasing to be arranged in a way that allows more green time for pedestrians and cyclists. • Nearside detectors are also provided for the equestrian crossings and the longer pedestrian/cyclist crossings to ensure they are cleared before green light is provided for traffic. <p>Within the Scheme proposals, pedestrian, cyclist and equestrian connectivity will be improved between the Transpennine Trail and existing equestrian routes along Old Hall Lane through the introduction of off carriageway pedestrian/cyclist/equestrian routes adjacent to the single carriageway between Wooley Bridge and Mottram Moor and the dual carriageway between Mottram Moor and Old Hall Lane. In addition, proposed cycle facilities along the existing A57</p>

Reference	IP Issue	NH Response
		<p>between M67 junction 4 and the Gun Inn junction will support connectivity between Hyde and Hollingworth.</p> <p>5. The assessment of the Scheme has demonstrated that it does not result in increases in traffic on roads outside of the DCO boundary sufficient to trigger the need for any mitigation measures. Consequently, the Scheme does not include any proposed additional measures outside of the DCO boundary to alleviate the potential for predicted traffic flow increases.</p> <p>6. For the reason stated in response 5 above, no Glossop Transport Hub is proposed as part of the Scheme. It would be for Derbyshire County Council as highway authority for this section of the road network to consider any future Glossop Transport Hub if appropriate.</p> <p>7. This is a question for Derbyshire County Council as highway authority responsible for this section of the A57.</p> <p>8. National Highways thanks SMJTS for the suggestion. National Highways intends to incorporate a variety of communication methods in ongoing project engagement to communicate the changes to local road users, including walkers, cyclists and horse riders prior to opening for traffic.</p>
9.84.49	<p>Public Rights of Way (PRoW)</p> <p>9. New segregated cycleways progress along the length of the road and is likely to attract 'hard core commuter cyclists'. Essentially PRoW finish at Dinting given local geographic, commercial land use and road width restrictions in the area. How can connectivity between Glossop, Tameside and Stalybridge away from the road be improved for wider access and participation in leisure and active travel?</p> <p>10. There are a couple of areas we are not clear on regarding cycle use and equine use. Please can the Applicant outline design detail for:</p> <ul style="list-style-type: none"> i. Carr House Lane – signalling and flow of non-motorised traffic; ii. M67 underpass at Hattersley; iii. Gun Inn and traffic lights at Coach Road for cyclist and equine crossing; iv. Roe Cross underpass. 	<p>9. The Scheme's proposals connect to existing cycle routes on Roe Cross Road towards Stalybridge. The cycling/equestrian/pedestrian facility adjacent to the proposed single carriageway link connects into the Transpennine Trail to the south of proposed junction with Woolley Lane. This provides onward off carriageway connectivity to the east and west of the Scheme.</p> <p>There is limited onward connectivity towards Glossop within the existing network, and while addressing this is not required as part of mitigation of the Scheme, it can be investigated separately through designated funds, subject to meeting the required funding criteria.</p> <p>10. i. Carr House Lane provides access to residential properties and a private means of access to and Carr House Farm. This also includes a public right of way which will be retained under the Scheme proposals.</p> <p>ii. The underpass below the A57 dual carriageway section will provide access for equestrians, cyclists and pedestrians in addition to farm vehicles.</p> <p>iii. The Gun Inn junction will be upgraded to introduce controlled pedestrian crossing facilities. While it is not proposed to provide crossing facilities for cyclists due to the constrained space within the junction, the provision of advanced stop areas for cyclists is being investigated as part of the detailed design to provide safe forward passage for cyclists.</p> <p>iv. The carriageway below Roe Cross Road bridge and the proposed underpass below Old Road and Old Hall Lane will be for vehicle use only.</p>

20. REP9-051 Stephen Bagshaw - comments on submissions for Deadline 8

20.1. Traffic Calming

20.1.1. Summary of key points made by Interested Party: Concerns regarding the diversion of traffic from the A57 in Glossopdale.

20.2. National Highways' response

20.2.1. The Scheme is not intended to encourage rat-running. The relatively small increase in traffic flows on some streets in Glossopdale is insufficient to trigger a need for the Scheme to provide any form of mitigation. Furthermore, without the Scheme there would be an overall greater displacement of traffic from main roads onto alternative and less suitable routes across the wider road network.

20.3. Rat-running

20.3.1. Summary of key points made by Interested Party: Derbyshire County Council's (DCC) position on the suitability of streets, such as Dinting Road, that will experience an increase in traffic flows due to the Scheme.

20.4. National Highways' response

20.4.1. No response required.

20.5. Beliefs versus facts

20.5.1. Summary of key points made by Interested Party: DCC make constant reference to their 'beliefs' which appear to be rooted in preference rather than empirical evidence.

20.6. National Highways' Response

20.6.1. No response required.

20.7. Optimization optimism

20.7.1. Summary of key points made by Interested Party: DCC's solution to the acknowledged additional queueing and future congestion at the Shaw Lane junction is a system of linked signalling arrangements at the proposed new junction at Woolley Lane to manage the traffic entering Glossop on the A57.

20.8. National Highways' Response

20.8.1. This is a matter for DCC as highway authority for this section of the road network. No improvements are proposed at the A57/Shaw Lane junction as part of the Scheme other than optimisation of the signal timings. Neither does the Scheme include any proposal for the linking or coordination of signal operation at the A57/ Shaw Lane junction with that at other junctions on the A57.


20.8.2. **Glossop ghostway**


20.8.3. Summary of key points made by Interested Party: The status of the Glossop Gateway as a draft document that is not in the public domain means that it has no adopted planning policy status whatsoever.

20.9. National Highways' Response

20.9.1. No response required.

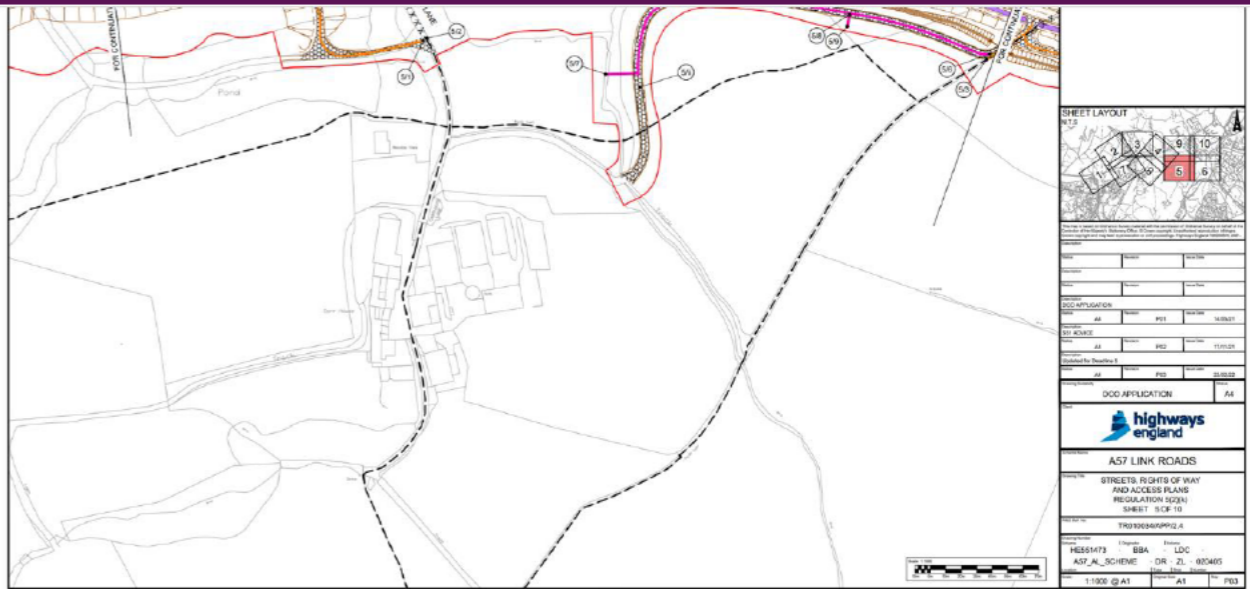
21. REP9-052 Roy Hollins - Comments on the Proposed Development

Reference	IP Issue	NH Response
9.84.50	<p>Further to my reading of the 4 page public notification posted to a lamp standard on the A57 road coming from Glossop, it is evident that A57, Link Roads project has had sanction from the The Planning Inspectorate', the project also has considerable involvement of others. I might bring to the attention of The Planning Inspectorate in your role as Operations Lead issues that are for your attention.</p> <p>Ref. Planning Application TR0100 34 Section 91 & 92 of the Planning Act 2008' Rule 13(6) of the infrastructure Planning (Examination Procedure) Rules 2010 Your 3 Nov. 2020 correspondence from Andrew Dawson, Highways England's Project Manager for the A57 Link Roads project proposals is somewhat lacking in his consideration regarding the crossing of an Ancient highway by one of the proposed Link Roads. I had downloaded a copy of your response to Andrew Dawson, your ref. TR010034 - letter dated 12 Nov. 2020. Your advice to Andrew was specific, however Andrews application on behalf of Highways England was lacking in historical reference which will likely have some consequential impact to the project proposals. Your correspondence was specific to advise Andrew of the policy with regard to the role of the Planning Inspectorate in the application process which is to provide its independent and impartial advice in order to obtain project sanction. I have lived with my wife in the Hague for some 53 years, our vehicle access to an Ancient highway was challenged and resulted in a High Court hearing, the 10 days of hearing ended in judgement that Carr House Lane was Ancient highway, a cross road between Turnpike Roads and was shown on 1777 Burdett's Map of Cheshire. The A57 Link Roads are being proposed and sanctioned for construction in the same area as is depicted on a 1777 Map. Due regard to legal and historical facts are needed to be considered.</p>	<p>The Ordnance Survey for this location shows only a public right of way footpath between The Hague and Carr House Farm.</p>  <p>The aerial photos would indicate only a grass path between The Hague and Carr House Farm.</p>

Reference	IP Issue	NH Response
		 <p data-bbox="1552 1312 2775 1415">TMBC's online map of adoptable highways¹ (brown line) shows no connection between The Hague and Carr House Farm, only public rights of way (purple line).</p>

¹ [REDACTED]

Reference	IP Issue	NH Response
		<p>The Streets Rights of Way and Access Plans accordingly show Carr House Lane south of Carr House Farm as public rights or way.</p>

Reference	IP Issue	NH Response
		 <p>An ancient highway is a road that was dedicated to public use as a highway before 31 August 1835, the date the <i>Highway Act 1835</i> (HA 1835) was passed. Dedication could either be express or implied from public use. Express dedication had to be accompanied by public use of the way.</p> <p>Before 31 August 1835, the inhabitants at large (that is, the inhabitants of the parish through which a highway ran) were liable, at common law, to repair the highway, unless it was proved that someone else was responsible for repairs.</p> <p>The new HA 1835 adoption provisions did not apply to any roads that had already become highways repairable by the inhabitants at large before 31 August 1835. It is these roads that were given the status ancient highways. Initially, the inhabitants at large remained liable, at common law, to keep ancient highways in repair. Today, the maintenance of ancient highways is generally the responsibility of the highway authority.</p> <p>It is appropriate for National Highways to base its plans on the evidence issued by the relevant public authorities. The dDCO acknowledges that there is a public right of way over Carr House Lane south of Carr House Farm as public rights of way and that is not inconsistent with any designation as ancient highway. Ancient highways do not require special or different treatment.</p> <p>It should also be noted that whilst the link from Mottram Moor to Woolley Bridge will cross Carrhouse Lane, provision has been made for an underpass to ensure that vehicular access to Carr House Farm and other properties is retained (see sheet 5 of the Scheme Layout Plans (REP8-004) and Structural Details sheet 4 in the Engineering Drawings and Sections Plans (REP5-005).</p>

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