

A57 Link Roads

TR010034

**8.3 Statement of Common Ground with
High Peak Borough Council**

APFP Regulation 5(2)(c)

Planning Act 2008 Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

May 2022

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009

A57 Link Roads

Development Consent Order 202[x]

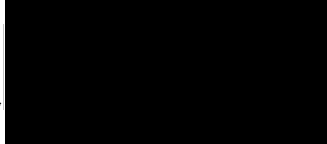
8.3 STATEMENT OF COMMON GROUND WITH HIGH PEAK BOROUGH COUNCIL

Regulation Number:	Regulation 5(2)(c)
Planning Inspectorate Scheme Reference	TR010034
Application Document Reference	TR010034/APP/8.3
Author:	A57 Link Roads Project Team, National Highways and Atkins

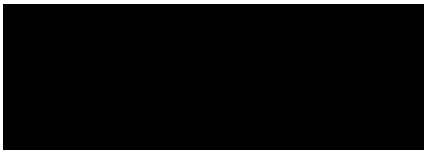
Version	Date	Status of Version
Rev 3.0	May 2022	Final Submission for Deadline 12
Rev 2.0	January 2022	Draft Submission for Deadline 2
Rev 1.0	June 2021	DCO Application

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) National Highways Limited and (2) High Peak Borough Council

Signed.....  **.....**

Andrew Dawson
Project Manager
On behalf of National Highways
Date: 16/05/2022

Signed..  **.....**

Neil W. Rodgers
Executive Director
On behalf of High Peak Borough Council
Date: 16/05/22

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1. Introduction

1.1. Purpose of this document

- 1.1.1. This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A57 Link Roads scheme (previously known as Trans-Pennine Upgrade) ("the Application") made by National Highways Limited ("National Highways") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 ("the Act").
- 1.1.2. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3. This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2. Parties to this Statement of Common Ground

- 1.2.1. This SoCG has been prepared by (1) National Highways as the Applicant and (2) High Peak Borough Council (HPBC).
- 1.2.2. National Highways (formerly Highways England) became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing the then Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England (now National Highways).
- 1.2.3. High Peak Borough Council forms part of a two-tier system of local government for High Peak, alongside Derbyshire County Council. HPBC covers the town planning administration of the area where the south eastern works of the Scheme are located and provides local services such as waste and recycling services, parks and tourism services and housing services.

1.3. Terminology

- 1.3.1. In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.
- 1.3.2. It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to High Peak Borough Council.

1.4. Addressing Rule Six requirements

1.4.1. The document evidences the meeting of conditions set out within Annex E of the Rule Six letter from the Examining Authority, dated 19 October 2021. High Peak Borough Council is a Category A interested party amongst other local authorities. The SoCG will address the following requirements within Annex E through the associated sections outlined in tables 1.1 and 1.2 below.

Table 1.1: Section Six Letter Annex E Requirement for all category A-D parties

Annex E Requirement	Relevant SoCG section
Applicable legislation and policy considered by the Applicant	1. Legislation and Policy 1.1 dDCO articles and associate schedules 1.2 DCO Requirements 1.3 Protective Provisions 1.4 Other DCO matters
The Applicant's assessment and the proposed mitigation measures: <ol style="list-style-type: none"> 1. The adequacy of the assessment and mitigation for each environmental topic. Consideration of scope, methodology, study area, receptors, and their sensitivity. Baseline conditions, how they were identified and whether all necessary information was obtained given the restrictions during the Coronavirus (COVID-19) pandemic 2. The flexibility sought for the detailed design, construction, and operational phases. Whether the extent of flexibility adopted in the Rochdale Envelope for assessment and evidence is consistent. The extent of the Rochdale Envelope. How the reasonable worst-case scenario has been assessed. 3. The magnitude and duration of construction and operational phase effects, mitigation, opportunities for enhancement, residual effects after mitigation and their significance, monitoring, and maintenance. 4. Whether any scoping out of detailed assessment is consistent with applicable legislation and policy, including the National Policy Statement for National Networks and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. 5. Whether the assessment methodology reflects best practice, whether it has been applied consistently, and whether the assessment of significant residual effects is fully evidenced and reasoned o Uncertainty arising from Coronavirus (COVID-19). 6. The application of professional judgements and assumptions. 	2 Assessment and proposed mitigation <ol style="list-style-type: none"> 2.1 Environmental assessment and mitigation <ol style="list-style-type: none"> 2.1.1 Adequacy of assessment for each environmental topic 2.1.2 Adequacy of mitigation for each environmental topic 2.1.3 Methodology 2.1.4 Baseline conditions and coronavirus 2.2 Flexibility and worst-case scenario 2.3 Construction and operational effects 2.4 Scoping out of detailed assessment and National Policy Statement for National Networks 2.5 Assessment of methodology and best practice 2.6 Application of professional judgements and assumptions 2.7 Mitigation and outline environment management plan 2.8 Residual impacts and securing of mitigation measures 2.9 Cumulative impacts 2.10 The significance of each residual impact

Annex E Requirement	Relevant SoCG section
7. The need for and adequacy of outline/ draft mitigation and management strategies and plans, including the Outline Environmental Management Plan. 8. Whether the mitigation measures, including embedded measures, are secured and are likely to result in the identified residual impacts, consistent with the Environmental Statement 9. The assessment of cumulative effects and the other plans and projects included in the cumulative impact assessment 10. The significance of each residual impact	
Whether the mitigation identified in the Environmental Statement is adequately secured by the combination of Requirements in the draft Development Consent Order with other consents, permits and licenses	3. Environmental Statement and DCO requirements
The draft Development Consent Order Requirements and associated provisions and documents; whether they are reasonable and relevant to planning and the development to be consented; whether they are enforceable and precise; whether they secure the proposed mitigation and monitoring; and whether any additional provisions are necessary	4. DCO requirements and associated provisions and documents
Matters for which detailed approval needs to be obtained, the proposed procedures for consultation on and the discharge of Requirements, and for approvals, consents, and appeals, including arbitration, and the roles of the local authorities and of other statutory and regulatory authorities	5. Matters for detailed review
The identification of consents, permits or licenses required before the development can become operational, their scope, management plans that would be included in an application, progress to date, comfort/ impediments and timescales for the consents, permits or licenses being granted	6. Other consents and permits
Opportunities for enhancement and environmental benefits.	7. Opportunities for enhancement and environmental benefits.
Human rights and equalities duties	8. Human rights and equalities duties
Any other relevant and important considerations	9. Any other relevant and important considerations

Table 1.2: Section Six Letter Annex E Requirement for only category A parties

Annex E Requirement	Relevant LPA Issues sub-section
Compliance with local policy and the development plans, impacts on land use and the acceptability of proposed changes to land use	10.1 Compliance with local policy and development plans
The achievement of sustainable development	10.2 Achievement of sustainable development
<p>The matters listed under the following headings in the ExA's Initial Assessment of Principal Issues:</p> <ol style="list-style-type: none"> 1. Transport networks and traffic, alternatives, access, severance, walkers, cyclists, and horse riders 2. Landscape and visual, green belt and good design 3. The historic environment 4. Air quality and climate change 5. Noise, vibration, and nuisance 6. Soils, ground conditions, material assets and waste 7. The water environment, drainage, flood risk assessment, water frameworks directive 8. Biodiversity, ecological and geological conservation 9. Land use, social and economic, human health 10. Other environmental topics 	10.3 Matters listed under assessment of principles
Whether potential releases can be adequately regulated under the pollution control framework, consistent the National Policy Statement for National Networks	10.4. Whether potential releases can be adequately regulated under the pollution control framework, consistent the National Policy Statement for National Networks
Any other relevant matters included in the ExA's Initial Assessment of Principal Issues	10.5 Any other relevant matters included in the ExA's Initial Assessment of Principal Issues
Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State	10.6 Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State

2. Record of Engagement

2.1.1. A summary of the meetings and correspondence that has taken place between National Highways and High Peak Borough Council since 2016 in relation to the Application, is outlined in Table 2-1.

Table 2.1: Record of Engagement between National Highways and High Peak Borough Council

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
11/7/2016	Stakeholder Engagement Workshop	An early engagement workshop with all relevant stakeholders to discuss the challenges and objectives of the A57 Link Roads development, a review of the elements of programme and issues, the delivery process, potential for early delivery of package elements, Hollingworth and Tintwistle.
9/8/2016	Stakeholder Questionnaire	A questionnaire was sent to all stakeholders after the workshop above.
1/5/2018	Steering Group Meeting	A scheme update was provided, with queries on traffic figures and the format of consultation on the traffic figures. Stakeholders requested to receive the traffic data prior to the release of the information to the public. There were discussions around the Local Impact Report and an update was provided on air quality and noise.
09/10/2018	Meeting	Key issues identified at the meeting include lack of traffic flow data and associated impacts on noise and air, cultural heritage assessment, Melandra Castle, viewpoints, landscaping, and the requirement for further economic and regeneration information in the PEIR.
10/09/2020	HE Email	Request for inventory drawings regarding lighting
04/11/2020	HE Email	Request for air quality data
04/11/2020	HE Email	S42 consultation pack distribution
05/11/2020	HPBC Email	Receipt of S42 consultation pack
11/11/2020	HE Email	Check status of issues regarding previous scheme
11/11/2020	DCC Email	Response to state it was not satisfied previous issues had been resolved
12/11/2020	HPBC Email	Provided HE with air quality data requested
12/11/2020	HE Email	Provision of draft traffic data
12/11/2020	HE Email	Meeting set up
12/11/2020	DCC Email	Meeting set up
13/11/2020	DCC Email	Meeting set up and information on consultant identified to assess traffic data
13/11/2020	DCC Email	Meeting set up
16/11/2020	Various Emails	Meeting set up and contact information
16/11/2020	HE Email	Meeting set up - Woolley Bridge

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
17/11/2020	HE Email	Information provide by email on Woolley Bridge proposed junction design
17/11/2020	DCC Email	Applicant received email from Derbyshire CC stating that it had assessed the traffic data provided for review and had a few questions about the modelling it wished to cover. The Consultee requested further information from Highways England.
17/11/2020	HE Email	An email was sent from Highways England to request their comments on traffic impact.
19/11/2020	HE Email	Email seeking confirmation of committed developments
19/11/2020	HPBC Email	Asked for clarification on committed development thresholds
19/11/2020	HE Email	Confirmed committed development thresholds
22/11/2020	HE Email	Meeting set up - general
22/11/2020	DCC Email	Meeting set up - general
23/11/2020	HE Email	Meeting set up - general
23/11/2020	DCC Email	Meeting set up - general
23/11/2020	HE Email	Meeting set up - Woolley Bridge design
24/11/2020	DCC Email	Meeting set up - Woolley Bridge design
26/11/2020	HE Email	Request for committed development information
27/11/2020	HE Email	Proposed meeting regarding air quality assessment results
28/11/2020	DCC Email	Example of SoCG between DCC and HE regarding A38 scheme
30/11/2020	HPBC Email	Meeting set up – air quality
30/11/2020	Meeting	A meeting was held to discuss additional traffic lane and signal design at Woolley Bridge Junction, traffic modelling.
01/12/2020	Meeting	A meeting was held between Highways England, HPBC and Derbyshire CC to discuss a number of landscape and cultural heritage issues.
03/12/2020	HPBC Email	Committed development information provided
08/12/2020	HE Email	Meeting set up - heritage
08/12/2020	DCC Email	An email was received from Derbyshire CC about the archaeological investigation methodology and Melandra Castle.
16/12/2020	HE Email	Request data on proposed housing development at Woolley Bridge
17/12/2020	DCC Email	Contact details for discussion regarding proposed housing development
17/12/2020	HE Email	Three-dimensional drawing of proposed Woolley Bridge Junction layout provided

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
17/12/2020	HE Email	Meeting minutes distributed for comment
17/12/2020	DCC Email	Confirmation meeting minutes were a 'fair reflection'
17/12/2020	DCC Email	Joint response from HPBC and Derbyshire CC to the consultation, stating that they were making a holding objection based on the lack of information provided on traffic and environmental impacts.
18/12/2020	HE Email	Email to confirm GI methodology
04/01/2021	HE Email	Email to provide GA drawings regarding street lighting.
06/01/2021	DCC Email	Email providing details of Derbyshire's updated street lighting specification.
06/01/2021	DCC Email	Email regarding discussion about scheme layout presented and draft comments. Contact details were also provided.
11/01/2021	DCC Email	Email regarding a DCC development in the locality of the Scheme
14/01/2021	HE Email	Confirmed that the DCC scheme and A57 Link Roads do not overlap, although opportunities for joint drainage could be considered.
01/02/2021	HE Email	Details of highway maintenance boundary drawings provided and request for meeting in summer 2021
01/02/2021	DCC Email	Agreement to meet regarding street lighting in summer 2021.
09/02/2021	HE Email	Draft Scheme Layout sent for comment plus request for existing asset details, review of commencement and maintenance definition, materials pallet, and existing adoption boundaries.
03/03/2021	HE Email	Chasing response to GI methodology
22/03/21	HE Email	Chasing responses to draft layout email and
22/03/21	DCC Email	Details of materials pallet and information on future contacts
24/03/21	HE Email	ES Cumulative effects assessment and committed development definition
25/03/21	HE Email	Review of COSA Assessment requested
26/03/21	HE Email	Chasing response to GI methodology
31/03/21	DC Email	Details provided of residential development at Woolley Bridge Junction to be considered in HE design
06/04/21	HPBC Email	Confirmed that the High Peak sites identified within the COSA assessment do not belong to the Council. Requested additional policy added with regard to High Peak BC.
30/07/2021	HPBC Email	HPBC outlined details of Local Impact Report details submitted with DCO application following discussions between HPBC, DCC and Aecom. Email sets out details of Data Queries, Information Requests, and Gaps in Transport Assessment.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
02/08/2021	HE Email	HE forwarded 30/07/2021 email to others at HE and Atkins to request comparison against questions posed by Aecom.
24/08/2021	HE Email	HE shared response to HPBC Link Road queries. HE attempted to follow up with a call but HBPC contact on annual leave.
3/12/2021	Meeting	Meeting between HPBC, NH and Atkins. Atkins discussed DCO process and SoCG matters. HPBC agreed to share outline for Local Impact Reports to support SoCG formation. Recurring meetings agreed and will be scheduled to support SoCG review with HPBC.
04/03/2022	Meeting	Meeting between HPBC and Atkins to discuss air quality matters
18/03/2022	Meeting	Meeting between HPBC and Atkins to discuss air quality matters
08/04/2022	Meeting	Meeting between HPBC and Atkins to discuss air quality matters
18/04/2022	Meeting	Meeting between HPBC, NH and Atkins to discuss and clarify the air quality matters raised during the hearing earlier in the week. Meeting only discussed the matters that directly addressed by air quality and future Traffic meeting held separately.
26/04/2022	Meeting	Meeting to discuss outstanding comments relating to Traffic, specifically to discuss the Select Link Analysis "SLA"
27/04/2022	Meeting	Meeting between HPBC, Atkins and NH to discuss air quality matters.
27/04/2022	Meeting	Meeting to discuss ongoing comments relating to environmental constraints and assessments
04/05/2022	Meeting	Meeting to discuss the latest positions of the SoCG's

Note: Meeting invites are not included in the table above

- 2.1.2. It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) National Highways and (2) High Peak Borough Council in relation to the issues addressed in this SoCG.

3. Table of issues and matters to be agreed

3.1. Issues Related to Rule Six Letter Annex E

**Table 3.1: Statement of Common Ground (SoCG) Between National Highways and High Peak Borough Council (HPBC)
 Table of Issues/Matters - Final Version dated 16 May 2022.**

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC comment	National Highways response	Status
1. Legislation and Policy					
2. Assessment and Proposed Mitigation					
2.1 Environmental Assessment and Mitigation					

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC comment	National Highways response	Status
2.1.1 Adequacy of assessment for each environmental topic					
2.1.2 Adequacy of mitigation for each environmental topic					
2.1.3 Methodology					
2.1.4 Baseline conditions and coronavirus					

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC comment	National Highways response	Status
2.2 Flexibility and worst case scenario					
2.3 Construction and operational effects					
2.3.1	Outline Traffic Management Plan [APP-186]	Construction traffic Disruption	The Consultee believes that there will be disruption to local residents and businesses during construction phase of the Scheme.	The Applicant has set out the potential construction impacts within the ES and Environmental Management Plan [TR010034/APP/6.3 and 7.2] The majority of the Scheme will be built offline decreasing such impacts. ES: APP-058 to APP-181 EMP: APP-183	Agreed
2.3.2	Impacts on Ancient woodland	Disruption	Further details requested around the impacts of AQ on the ancient woodland around Shire Hill, in the short-term assessment	The Applicant has provided a response regarding the impact at Shire Hill Ancient Woodland in Comments on Local Impact Report submitted by Derbyshire County Council and High Peak Borough Council (Item 8.45, REP3-018).	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC comment	National Highways response	Status
				The Applicant has provided a response regarding the impact of construction vehicle movements and construction traffic management at sensitive receptors in HPBC in SoCG item 9.20 and 9.21 respectively.	
2.4 Scoping out of detailed assessment and National Policy Statement for National Networks					
2.5 Assessment of methodology and best practice					
2.6 Application of professional judgements and assumptions					

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC comment	National Highways response	Status
2.7 Mitigation and outline environment management plan					
2.8 Residual impacts and securing of mitigation measures					
2.9 Cumulative impacts					
2.10 The significance of each residual impact					

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
3. Environmental Statement and DCO Requirements					
3.1	Environmental Statement (ES) [APP-061]	Air Quality Methodology AQMA's	The Consultee stated that air quality is a major concern. Since the last public consultation on the scheme in 2018, HPBC has designated Air Quality Management Areas (AQMA's) on sections of the A628 in Tintwistle and the A57 at Dinting. Detailed assessment is required.	The Applicant's air quality assessment (in the ES [APP-061]) has taken into consideration the AQMA designated since 2018 in Tintwistle and Dinting Vale. The air quality assessment has been undertaken in accordance with DMRB LA105 with the air quality study area determined on the basis of traffic change criteria given this guidance.	Agreed
3.2	Environmental Statement (ES) [APP-061]	Air Quality Methodology Dinting Vale	The Consultee questioned the air quality results at Dinting Vale.	The air quality assessment has been undertaken in accordance with DMRB LA105 with the air quality study area determined on the basis of traffic change criteria given this guidance. A detailed assessment of air quality has been undertaken for all areas where traffic changes are expected, which includes the Dinting Vale area. Full results will be reported in the Environmental Statement [APP-061].	Agreed
3.3	Environmental Statement (ES)	Air Quality Methodology	The Consultee indicated that the potential impact of the Greater Manchester Clean Air Zone (CAZ) and associated risk of 'rat runs' should be considered.	The scheme traffic model has been revised and refined since the previous consultation in 2018. Additional routes that could be used as 'rat runs' have been included in the traffic model used to	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
	[APP-061] Air Quality	Greater Manchester Clean Air Zone (CAZ)		<p>inform the assessment for the DCO application.</p> <p>The Scheme is located within the CAZ boundary. The CAZ has been developed in parallel with the Applicant's scheme, so it was not possible to consider it in the traffic and air quality modelling. However, the air quality assessment undertaken, which does not include the CAZ, can be considered a worst case.</p> <p>Changes to the boundary extents of the GM Clean Air Zone have been made to extend the boundary along the A628 to the borough boundary of TMBC and DCC, meaning that the potential opportunities for traffic looking to avoid the congestion charging along this length has now been removed with this change to the order limits.</p> <p>The implementation of the GM CAZ is currently under review, but the boundary extents remain the same.</p>	
3.4	Environmental Statement (ES) [APP-061]	Air Quality Methodology	The Consultee stated that in the absence of traffic data it was unable to assess the air quality assessment outlined in the PEIR.	The Applicant has provided traffic modelling and air quality data within its DCO application. (Environmental Statement [APP-61] and] Transport Assessment Report [APP-185]	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
	Air Quality	Insufficient information			
3.5	Environmental Statement (ES) [APP-062]	Archaeology & Cultural Heritage Methodology Cultural heritage assessment	The Consultee suggested that the following assets should be included in the assessment; Scheduled Monuments and non-designated, valued assets in the immediate Longdendale landscape; Tintwistle and Langsett Conservation Areas and assets along the A57 extending to Ladybower.	The Applicant has reviewed the inclusion of these assets within the assessment in the Cultural heritage chapter (Chapter 6) of the ES [REP1-015].	Agreed
3.6	Environmental Statement (ES) [APP-062]	Archaeology & Cultural Heritage Methodology Melandra Castle	It indicates that the assessment of setting impacts to Melandra Castle should comprise a setting study following the five-step principle established in Historic England guidance and include appropriate viewpoint photography/ photomontages to show the potential impacts of the development.	The Applicant undertook the assessment in relation to this guidance.	Agreed
3.7	Environmental Statement (ES) [APP-062]	Archaeology & Cultural Heritage Methodology	The Consultees stated it that it had requested additional viewpoints of Melandra Castle but could not see them within the consultation materials.	The Applicant stated that it currently had three representative Viewpoints in the vicinity of Woolley Bridge and Melandra Castle: a) View from the Woolley Bridge (A57) adjacent residential properties:	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
		Melandra Castle		b) View from Trans Pennine Trail c) View from PRow HP12/72/3 adjacent Melandra Castle (SAM)	
3.8	Environmental Statement (ES) [APP-064]	Biodiversity Methodology Assessment	The Consultee expressed that as only a small part of the Scheme lies within Derbyshire it is difficult to understand the in/direct impacts as Derbyshire CC only has comprehensive ecological data within the count.	The Applicant will include its ecological assessments within the Biodiversity chapter (Chapter 8) of the ES [REP1-016] as part of the DCO application	Agreed
3.9	Environmental Statement (ES) [APP-064]	Biodiversity Methodology Surveys	The Consultee stated that the ecological surveys identified in the PEIR were acceptable.	Applicant noted	Agreed
3.10	Environmental Statement (ES) [APP-063]	Landscape and Visual Impacts Assessment Land take for landscaping	The Consultee stated the Scheme's success will be dependent on assessment results, mitigation on identified impacts and how it will reinforce landscape character.	The Applicant selected 31 representative viewpoints for the visual effects assessment, which were agreed with the Local Planning Authorities (LPAs) - PDNPA, Tameside Metropolitan Borough Council, HPBC, Derbyshire CC. It has scoped some of the viewpoints out (listed below) as the footprint of the Scheme has been reduced resulting in some viewpoints no longer representing receptors likely to experience a significant effect.	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
				<p>The assessment of the indirect effects methodology has been reassessed.</p> <p>The Arcadis (2018) methodology was previously agreed with the PDNPA. Highways England will seek to discuss and agree these amendments with PDNPA, and discussions are ongoing.</p>	
3.11	<p>Environmental Statement (ES)</p> <p>[APP-063]</p>	<p>Landscape and Visual Impacts Assessment</p> <p>Night time views</p>	<p>The Consultee queried whether night time views have constituted any additional viewpoints as at night the impact of lighting may cause new visual impacts.</p>	<p>In line with DMRB guidance (LA 107) a high-level night-time assessment will be undertaken for landscape and visual receptors which might be likely to be affected by the addition of artificial lighting from lighting columns associated with the Scheme.</p> <p>The night-time landscape of the 1km study area has also been undertaken along with site visits to six representative viewpoints. The viewpoints were selected to obtain the most unobstructed night views of the Scheme and provide an accurate representation of the receptors along the Scheme corridor. The assessment considers the 'sight of light' and the effects of light on the character of an area, views and a general quality of life. The night-time assessment can be found with the summary schedules.</p>	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
3.12	Environmental Statement (ES) [APP-063]	Landscape and Visual Impacts Assessment Ecology and lighting	The Consultee raised the impact of lighting on ecology.	The Applicant considered that vegetation would be retained in the area and plans for planting which would mitigate lighting impacts on ecology.	Agreed
3.13	Environmental Statement (ES) [APP-063]	Landscape and Visual Impacts Assessment Planting	The Consultee indicates that planting in a linear form does not hide the route from view. It draws attention to the traditional setting and requests that enough land is made available to deliver the enhancements and mitigations of the Scheme. It states that attenuation ponds can be overengineered and should also consider biodiversity net gains.	The Applicant states that the mitigation will be landscape led and aligned with the existing landscape character. For each localised section of the route it has created scheme level character areas, which include naturalistic designs for SuDs and slopes. The focus will be on scope profiling around access tracks.	Agreed
3.14	Environmental Statement (ES) [APP-063]	Landscape and Visual Impacts Assessment River Etherow Bridge crossing	The Consultee indicated that that the Bridge crossing over the River Etherow is shorter than proposed and it should ensure a sufficient scale to allow the landscape and ecology of the river to 'flow' beneath it.	The Applicant stated that the impacts created by the Bridge will be reviewed in the ES [TR010034/APP/6.3] and any required mitigation included in the design.	Agreed
3.15	Environmental Statement (ES)	Socioeconomic assessment	The Consultee stated that the PEIR and ES should include a more extensive and robust assessment of likely economic and regeneration benefits.	The Applicant stated that strategic employment sites have been scoped out in accordance with PINS guidance. The Case for the Scheme [REP1-036], which	Agreed

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
	[APP-068] Population and Human Health	Assessment Economic and regeneration benefits	HPBC still feel the economic benefits remain unclear, whilst obvious benefits for journey in and out of the borough, what impact for shorter local journeys	will be part of the DCO application pack will consider the economic impacts of the Scheme	
3.16		Alternative options Tintwistle	The current scheme only addresses the congestion issues on the A57 In Mottram, we would be supportive of further assessments beyond the current scheme that look to address the issues on the A628 in Tintwistle.	The various alternatives assessed are described in Chapter 3 of the ES, whilst these are not part of the proposed scheme we appreciate the view point of the consultee.	Agreed

4. DCO Requirements and associated provisions and documents

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5. Matters for detailed approval

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
5.1	Flood Risk Assessment [APP-056]	Future maintenance Flood risk and drainage	The Consultee wishes to be engaged with the Applicant to identify future maintenance liabilities for the flood risk and drainage elements of the Scheme, which could be included in a SoCG.	Applicant agrees that ongoing discussions are required.	Agreed
6. Other consents and permits					
7. Opportunities for enhancement and environmental benefits.					

SoCG Ref. Number	Relevant examination document	Relevant Issue	HPBC Comment	National Highways response	Status
8. Human rights and equalities duties					
9. Any other relevant and important considerations					
9.1	Consultation Report [APP-026]	Insufficient information Lack of data in the PEIR – traffic/ environment	The Consultee expressed significant concern was expressed regarding the absence of environmental and traffic data published with the public consultation. It stated that the lack of information in the PEIR prevented it from developing a Local Impact Report or any other assessments of the Scheme’s impacts.	The Applicant has updated environmental and traffic data within the DCO Application. The traffic modelling has been altered following changes to the Scheme arising from consultation.	Agreed
9.2	Consultation Report [APP-026]	Insufficient information Lack of data in the PEIR	The Consultee stated that it’s comments on the 2018 PEIR remain.	The Applicant will consider these issues within the DCO application and accompanying ES [APP-61].	Agreed

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9.3	Consultation Report [APP-026]	Insufficient information Holding objection	The Consultee asked what additional information would be set out in the ES as it has a holding objection on the basis of limited information.	The information provided within the PEIR for consultation has been significantly progressed since the previous consultation. It sets out everything that will be included within the detailed Environmental Impact Assessment of the Scheme that can be found within the ES [APP-61]. The Applicant has provided additional information in the ES within the DCO application.	Agreed
9.4	Consultation Report [APP-026]	Insufficient information Holding objection	The Consultee asked what additional information would be set out in the ES as it has a holding objection on the basis of limited information.	The information provided within the PEIR for consultation has been significantly progressed since the previous consultation. It sets out everything that will be included within the detailed Environmental Impact Assessment of the Scheme that can be found within the ES [APP-61]. The Applicant will provide additional information in the ES within its DCO application.	Agreed
9.5	RR-0240-15	Relevant Representation General Air Quality concerns not	Unfortunately, the assessments submitted in support of the Development Consent Order application also omit consideration of the impacts on the AQMAs. The Council is keen to explore the basis for this by examining the underlying assumptions and projections in the	The Dinting Vale Junction, which is within the Glossop AQMA, has been considered in the air quality assessment presented in Chapter 5: Air Quality of the ES (APP-061). Other parts of the Glossop AQMA and also the Tintwistle AQMA do not	Agreed

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		previously highlighted in SoCG	traffic modelling. Seemingly, traffic is projected to avoid the A57 through Glossop town centre by taking alternative routes such as Shaw Lane.	<p>include sections of roads that trigger the need for further assessment of air quality as discussed above. (R-869-14).</p> <p>The Scheme is forecast to result in an increase in traffic on Dinting Road and Shaw Lane. This route is currently a well-known and well-used alternative to the A57 through Glossop. This is because of traffic congestion and delays on Glossop High Street at certain times of day. The Scheme itself is not introducing any specific measures on this part of the network that would modify this traffic behaviour. However, the absolute increases in traffic flow due to the Scheme by 2040 are forecast to be relatively low at up to 91 vehicles per hour (less than 1 vehicle per minute each way) on Shaw Lane and up to 159 per hour on Dinting Road (less than 1 vehicle every 45 seconds each way).</p> <p>This part of the road network is outside of the Scheme boundary and it is, therefore, a matter for Derbyshire County Council to address issues of traffic using alternative roads to avoid traffic congestion on Glossop High Street.</p>	

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				<p>The discussion around this topic have evolved and considered in items 9.19 and 9.20 of this SoCG.</p>	
9.6	RR-0240-20	<p>Relevant Representation</p> <p>Emissions and modal shift</p>	<p>There is a lack of reference to, and acknowledgement of, the Government’s strategic priorities of reducing emissions, and increasing modal shift to active travel.</p> <p>HPBC response at Deadline 4</p> <p>It is agreed that the standard AQ assessments do not tend to directly include possible climate change effects on future air quality emissions at receptors. This is essentially because of the inherent difficulty in predicting the future meteorological changes due to climate change. It is certainly correct to say that future NO2 emissions from vehicles should reduce overtime as society switches to less polluting vehicles. However, how this would translate into any effects on air quality experienced by receptors emissions, due to addition changes in meteorological conditions (as a result of climate change) can only be postulated.</p>	<p>Chapter 14: Climate of the ES has considered the relevant legislation in force, however it did not include the DfT’s Transport Decarbonisation Plan as this was published in July 2021, after the DCO application in June 2021. The plan outlines a number of commitments by the Government to remove all emissions from road transport to achieve net zero target by 2050. Commitments that will have a direct impact on road user emissions from the Scheme will include:</p> <ul style="list-style-type: none"> • An end to the sale of new petrol and diesel cars and vans by 2030 • All new cars and vans to zero emissions at the tailpipe by 2030 • All new L-category vehicles to be fully zero emissions at the tailpipe by 2035 <p>Current policy commitments mean that the greenhouse gas assessment presented in Chapter 14: Climate of the ES (REP1-019) is considered to be an overestimate as the uptake of new electric vehicles in future years would be</p>	Agreed

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				<p>expected to be higher than the proportions used in the national projections included in Defra's Emissions Factor Toolkit (v10) used for the scheme assessment. Within the Emissions Factor Toolkit account is not taken for the increase of electric vehicles beyond 2030. It has been agreed that the Applicant as part of the DCO planning process, has provided additional information and clarity on these matters.</p>	
9.7	RR-0240-22	<p>Relevant Representation</p> <p>Emissions and transport fleet</p>	<p>Vehicle emission factors take account of Department for Transport fleet projections including conventional vehicles (petrol and diesel) as well as hybrid and electric vehicles, but do not take account of government commitments to changes in fleet makeup, for example the phasing out of conventional fuel cars and vans by 2030.</p> <p>HPBC response at Deadline 4</p> <p>It is agreed that the standard AQ assessments do not tend to directly include possible climate change effects on future air quality emissions at receptors. This is essentially because of the inherent difficulty in predicting the future meteorological changes due to climate change. It is certainly correct to say that</p>	<p>The emission factors used for greenhouse gas (GHG) operational road traffic assessment were based on Defra's Emission Factor Toolkit (EFT) v10.1 published in Aug 2020. The emission factor projections go out to 2030.</p> <p>Summary information can be found via this link to the Defra website: https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/.</p> <p>Default fleet split assumptions, vehicle size distributions and Euro class compositions are based on a set of traffic activity projections from the Department for Transport (DfT) (Road Traffic Forecasts (RTF) 2018) and DfT car sale projections (April 2019) including the uptake of low carbon passenger cars and</p>	Agreed

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			<p>future NO2 emissions from vehicles should reduce overtime as society switches to less polluting vehicles. However, how this would translate into any effects on air quality experienced by receptors emissions, due to addition changes in meteorological conditions (as a result of climate change) can only be postulated.</p>	<p>LGVs with electric and hybrid electric propulsion systems.</p> <p>All of these data sources for the fleet projections predate the announcement to end the sale of petrol/diesel vehicles by 2030 and updated to these data sources have not yet been published. Previously it was assumed zero emission was to be achieved by 2050.</p> <p>It has been agreed that National Highways will undertake a sensitivity test to understand any changes as part of any updates to forecasting data sets issued by the Department for Transport. The findings of this sensitivity test will be shared with DCC.</p>	
9.8	RR-0240-28	<p>Relevant Representation</p> <p>Economy and Regeneration</p>	<p>We are keen to determine the implications of the scheme to the local economy. This theme will be considered as part of our Local Impact Report. HPBC has commissioned a Masterplan for the Glossop Gateway corridor from Woolley Bridge into Hadfield and Glossop town centre along the A57 with a view to maximising any potential opportunities and benefits which may arise from the scheme. However, as outlined above, this work cannot conclude without further consideration of the traffic flows.</p>	<p>The traffic data referred to has now been provided as per the response to RR-0240-2.</p>	Agreed

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9.9		Severance and safety for non-motorised users	The increase in traffic and congestion through Glossop could pose a safety concern in relation to key school walking routes, and affect shopping habits within the town centre – potentially affecting town centre vitality. This is not considered in the Environmental Statement.	The applicant has undertaken WHCR assessment in area and is looking to develop opportunities in and around the area as part of the scheme, this will continue through engagement with relevant organisations and LA's, as part of detailed design. With regard to a new crossing adjacent the school as mentioned by the consultee, It has been confirmed that as part of a recent planning application funding for a controlled crossing facility on Dinting road has been secured.	Agreed
9.10		Public transport impacts	The increased local journey times would likely affect the timing and reliability of public transport services. This may lead to a decreased desirability to use these	The applicant will look to work with the relevant authorities to minimise any impacts of the scheme on the existing services in the area, it is expected that journey time changes will be seen which could mean revisions to existing timetables	Agreed
9.11	[REP4-011]	Construction dust monitoring	Item 8.37 HPBC [REP4-011] requested further clarification on whether construction dust monitoring will be carried out at high-risk sites.	National Highways is committed to updating the EMP (First iteration) at the detailed design stage. The EMP (Second iteration) submitted at this stage will include further detail on the construction monitoring. The local authorities will be consulted on the EMP (Second iteration) as required through requirement 4 of DCO with the	Agreed

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				parameters used to identify whether monitoring would be required agreed with both the local authority's and appointed Principal Contractor. This approach including timescales for consultation has been discussed and agreed with High Peak Borough Council (HPBC) (virtual meeting held 4th March 2022)	
9.12	[REP4-011]	Figure 5.4 Air Quality Compliance Risk Assessment – receptor labels	<p>Item 8.38 HPBC [REP4-011] asked for the A57 Brookfield qualifying features used in the NO2 compliance assessment to be labelled on ES Figure 5.4 [APP-080].</p> <p>It is noted that this response was supplied at deadline 7 by NH. Clarification of receptors did highlight that there were some relevant receptors in the Brookfield area that had not been included in general AQ assessment but had been included in the compliance assessment (see Item 9.22)</p>	Given the number of qualifying features and public access receptors included in the compliance assessment it was not possible to practically label the qualifying features in ES Figure 5.4 (APP-080) however, an extract of ES Figure 5.4 zoomed in on the A57 Brookfield area with receptor ID labels for qualifying features and public access receptors adjacent to the A57 Brookfield is provided in the Addendum to the Statement of Common Ground with High Peak (REP8-017).	Agreed
9.13	[REP4-011]	Adjustment of Background Concentrations Data used in Air Quality Assessment	<p>Item 8.39 HPBC raised concerns about the lack of adjustment to the background concentrations used in the air quality assessment. HPBC [REP4-011] suggest they are concerned about over representation of beneficial effects</p>	The HPBC query relates to the verification and adjustment of the Department for Environment, Food and Rural Affairs (Defra) mapped background concentrations. National Highways provided a response to question 8.39 in REP3-018. As stated in REP3-018, where the Defra background maps under predict background	Agreed

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				<p>monitoring data this could lead to a need to apply a higher adjustment factor in the air quality model verification. The higher the adjustment factor applied, the more conservative the results of the assessment given that the adjustment is applied to both the modelled total concentration with and without the Scheme, which has the effect of increasing the change in concentration. Where concentrations are expected to decrease with the Scheme this could lead to some over representation of the benefits in the results, however, given the balance of benefits and disbenefits this is not considered to impact the overall conclusions on significance of effect, which is stated in the ES as not having a significant adverse effect on air quality due to the Scheme. National Highway's response to question 8.43 in REP3-018 provides an explanation of the DMRB LA 105-terminology regarding significance as applied to beneficial effects.</p> <p>The approach to the background concentrations used in the air quality assessment has been further discussed with HPBC (virtual meeting held 4 March 2022). Comparisons of Defra mapped background concentrations and monitoring data for background</p>	

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				sites is presented in ES Appendix 5.3 (APP-157). This indicates the absolute difference in between mapped and monitored concentrations is small, the majority of comparisons of mapped concentrations are within 10% of monitored concentrations and there was also no systematic bias in the comparison. On this basis HPBC agreed that the approach applied in the air quality assessment as presented in the ES was appropriate (virtual meeting held 4th March 2022).	
9.14	[REP4-011]	Application of Road Gradient Effects within the Air Quality Assessment	<p>Item 7.2 HPBC [REP4-011] highlighted that DEFRA guidance (DEFRA LAQM TAG16 paragraph 7.449) suggests identification of all roads with a gradient of more than 2.5% for the modelling of gradient effects which HPBC suggest that all roads above 2.5% gradient should be considered in the air quality assessment.</p> <p>HPBC Position</p> <p>HPBC concede that given the size of the project the application of gradients across the study area, although desirable for a more accurate model, would be onerous. Gradients were applied at three locations, where the gradient appeared to be obviously</p>	Road gradients across the study area vary widely with a large number of locations with gradients of more than 2.5%. Gradient undulations along individual stretches of road mean that to account for smaller gradients (between 2.5% and 6%) consistently across the model, multiple traffic model links would need to be split into gradient specific sections. Given the size of the study area and nature of the model, there was a need to be proportionate in the approach to model set up. Therefore, when the gradient effect was introduced whilst improving the model as part of the model verification process there was a focus on A-roads within air quality management areas (AQMAs) locations where model verification was below acceptable performance, and	Agreed

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			<p>greater than 6% (one location in HPBC) to improve the model performance. Given AQMA's were not really included in the assessment it is not clear how this factored into this decision. The sensitivity tests were conducted to determine if by not applying a gradient to the modelled results, which was generally the case (bar 3 locations), this affected predicted model outcomes. Sensitivity tests were thus conducted at 2 receptors in Tintwistle that had previous been predicted to have the highest modelled NO2 levels but had previously been modelled with no gradient (not 6%), to see if the application of the gradient caused a significant increase in predicted emissions. The presented results indicated that application of a 2.5% & 6% gradient increased predicted emissions by 3.1 & 6.5% respectively. Consequently HPBC agrees that further consideration / alteration of this model input, within the stated ARN, is unlikely to significantly alter the given interpretation of results.</p> <p>HPBC response at Deadline 8 Sensitivity tests were thus conducted at 2 receptors in Tintwistle that had previous been predicted to have the highest modelled NO2 levels but had previously been modelled with no gradient (not 6%), to see if the application of the gradient caused a significant increase in predicted emissions.</p>	<p>locations with more considerable gradients (6% or greater). Although Defra Local Air Quality Management Technical Guidance (LAQM.TG16) provides relevant guidance on air quality modelling methodology, it's primary focus is on assisting local authorities with review and assessment of air quality for local air quality management and is therefore more applicable to much smaller model study areas focused on specific locations with known poor air quality where a more detailed approach to the inclusion of gradient effects may be appropriate. National Highway's DMRB LA 105 is designed for larger scale modelling exercises as required for strategic highways projects and does not require the inclusion of gradient effects in model set up. The selection of a criteria of 6% was used as this is the maximum gradient for which the Defra Emission Factor Toolkit (EFT v10.1) will calculate a gradient effect on vehicle emissions.</p> <p>As stated above, road gradients across the study area vary widely with a large number of locations with gradients of more than 2.5%. It is not considered to be practical to identify all individual sections of road with a gradient over 2.5%. For those link sections modelled</p>	

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			<p>The presented results indicated that application of a 2.5% & 6% gradient increased predicted emissions by 3.1 & 6.5% respectively. Consequently HPBC agrees that further consideration / alteration of this model input, within the stated ARN, is unlikely to significantly alter the given interpretation of results.</p> <p>Although HPBC accepts that the impact of the gradient (as noted above), is unlikely to significantly affect the interpretation of the results, further clarification was sought regarding how a gradient was included in the initial assessment (at the 3 locations), given that emission factors used (DMRB) were based on speed bands, rather than speed / gradient available in Eft (-see discussion below on speed bands).</p> <p>The updated response from NH on the methodology applied is highlighted. Essentially, this states that the DMRB emission factors were manually adjusted (bespoke) to take into account the 6% gradient at these locations</p> <p>The explanation presented by NH in the meetings (reproduced here) is deemed acceptable.</p> <p>As noted previously, HPBC concede that given the size of the project, the application of gradients across the study area, although desirable for a more accurate model, would be onerous, particularly given that DMRB speed band emission factors were used, which do not</p>	<p>with gradient effects the impact on emissions have been accounted for in the calculation. Gradient effects, where relevant, have been included in the model, for those locations which are at risk of exceeding Air Quality Strategy objectives and therefore the inclusion of wider gradient effects across the study area is considered unlikely to impact the overall conclusions or Scheme assessment of significant of effects.</p> <p>The inclusion of gradient effects in the modelling presented in the ES has been undertaken based on the following methodology:</p> <ul style="list-style-type: none"> • For each link and directional flow (uphill/downhill) in each traffic model periods (IP, AM, PM and OP) the DEFRA Emission Factor Toolkit (EFT) v10.1 was used to calculate the link emission rate both with and without the applied gradient effect. • The EFTv10.1 emission rate was calculated based on the hourly period modelled traffic data (AADT, %HDV and average speed) and applied percentage gradient. • The ratio of the EFTv10.1 emission rates with and without the gradient effect was calculated and applied to the equivalent link emission rate (without gradient effect) 	

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			<p>readily lend themselves to the application of gradient effects.</p> <p>While we do accept the approach taken in light of further explanation of the methodology adopted, it is considered that this approach and methodology could have been more obvious in the submitted ES.</p>	<p>calculated using the DMRB LA105 speed band emission factors.</p> <ul style="list-style-type: none"> • The uplifted DMRB LA105 speed band emission rates were then used to build the hourly link emission profiles used within the air quality dispersion modelling. <p>The approach to modelling gradient has been further discussed with HPBC (virtual meetings held 4th March 2022, 18th March 2022 and 8th April 2022). Atkins on behalf of National Highway's subsequently carried out a model sensitivity test to consider the impact of applying a gradient of less than 6% further. Following discussion of the results of the sensitivity test (virtual meeting held 18th March 2022) and further discussion of how the gradient was reflected in the air quality dispersion modelling (virtual meeting held 8th April 2022) HPBC agreed that the approach applied in the air quality assessment as presented in the ES was appropriate.</p> <p>The approach to modelling gradient has been further discussed with HPBC (virtual meetings held 4th March 2022 and 18th March 2022). Atkins on behalf of National Highway's subsequently carried out a model sensitivity test to consider the impact of applying a gradient of less than 6% further. Following discussion of the results of</p>	

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				the sensitivity test (virtual meeting held 18 March 2022) and further discussion of how the gradient was reflected in the air quality dispersion modelling (virtual meeting held 8th April 2022), HPBC agreed that the approach applied in the air quality assessment as presented in the ES was appropriate.	
9.15	[REP4-011]	Verification Zoning used in Air Quality Assessment	Item 7.2 HPBC [REP4-011] requested clarification on the localised model zones used in the air quality assessment	The approach to the model verification zoning used in the air quality assessment has been further discussed and agreed with HPBC (virtual meeting held 4th March 2022)	Agreed
9.16	[REP4-011]	The use of multiple monitoring surveys in model verification	Item 7.2 HPBC [REP4-011] requested further information on the methodology used for monitoring data annualization and a comparison of results from the different surveys within the study area. HPBC Position The applicant undertook sensitivity tests to look at model validation using the different survey data in isolation. Generally speaking the ES applied correction factors compared reasonably well (in terms of correction factors & RSME) for the generated A57 & A628	Air quality monitoring surveys are not always able to be undertaken in the period directly comparable to the base traffic model year. Therefore, annualisation is used to maximise the data available for model verification. This approach has been used on a number of other National Highways schemes. Defra LAQM TG16 Box 7.9 (final paragraph) provides a method for estimating an annual mean concentration in a year previous to a short term monitoring survey which has been adopted in the assessment to annualise survey data to the traffic model base year.	Agreed

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			<p>zones using the other data sets (including HP only) and application of these different correction factors would not significantly affect interpretation. The Dinting zone is less clear, as the data set (used) is much smaller (4 sites) and therefore, only one alternative HP (and MMLR) data set can be looked at (in isolation). If the single tubes are used (not appropriate) the correction factor would be much higher. Inclusion of the HP tube (swapping out of a corresponding TPU tube) increases the correction factor slightly, but the results / interpretation remain consistent with the ES. That is that one exceedance at R319 exists but is not due (only compounded) by the scheme. It is accepted therefore, that based on the zoning adopted, the correction factor used in the ES is the most applicable correction factor available. However, it should be noted, that should there be a requirement to undertake a further AQ assessment of the dinting vale AQMA, it would be expected that this zone would be expanded / adjusted, to include appropriate available data sets within the AQMA to improve the confidence in this adjustment factor.</p>	<p>Analysis of the data from each survey showed that although there is some variation in monitored results between the HPBC and the National Highways Scheme specific survey (TPU survey), these are largely within a normal range of variance as shown by the variance between the triplicate tubes from National Highways TPU survey. In addition, 2018 data for National Highways Scheme specific survey MMLR sites in same location as HPBC sites also show little variation.</p> <p>National Highways TPU annualised measured 2018 annual mean data and 2019 measured data backcast to 2018 are also within the normal range of variance between co-located tubes. Notably the National Highways TPU 2019 measured data backcast to 2018 concentrations were higher than National Highways TPU 2018 measured concentrations at tubes located at Dinting Vale Junction.</p> <p>The approach to the annualisation of monitoring surveys used in the air quality assessment has been discussed and agreed with HPBC (virtual meeting held 4th March 2022). However, HPBC had remaining concerns regarding the</p>	

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				<p>use of the different surveys in verification. Atkins on behalf of National Highway's subsequently carried out verification sensitivity tests to consider the impact of undertaking the verification and adjustment of HPBC zones using data from each of the individual surveys to calculate adjustment factors for each survey dataset. Following discussion of the results of the sensitivity test (virtual meeting held 18 March 2022), HPBC agreed that the approach applied in the air quality assessment as presented in the ES was appropriate.</p> <p>It was confirmed (virtual meeting held 8th April 2022) that no further sensitivity testing of verification was needed.</p>	
9.17	[REP4-011]	Speed Band Emission Rates used in Air Quality Assessment	There is currently a lack of understanding from HPBC regarding the application of the speed bands to the different roads (light congestion, heavy congestion, free flow) and the effects this may have on modelled emissions. Results shared by HE indicate that generally, traffic is considered to be lightly congested and that that only minimal changes from DM allocated speed band are expected as a result of the scheme (DS).	<p>Speed bands and associated speed band emission rates applied within the air quality model within HPBC have been discussed with HPBC (virtual meetings held 18th March and 26th April 2022). Additional speed band data was provided via email to HPBC on 1st April 2022.</p> <p>The speed bands used for the air quality assessment are directly derived from the forecast traffic speeds in the traffic model. The speed band categories used are those defined in DMRB LA105. The</p>	Agreed

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			<p>Discussions between NH and High Peak have explained the use of speed bands, notably the emissions allocated to predicted speeds and how this compares with the Defra EFT v10.1.</p> <p>National Highways speed band emission factors typically represent the Defra EFT v10.1 emissions for the mid point of the speed band range. This means that National Highways speed band emission factors are likely to predict lower than Defra EFT v10.1 for speeds at lower range of a speed band, but overpredict Defra EFT v10.1, for speeds for upper range of a speed band e.g the “lightly congested” speed band is 20 – 40 kph, so roughly speaking below 30kph it will underpredict and above 30 kph it will overpredict (compared to EFT), with the difference increasing as you move away from the midpoint.</p> <p>In addition the use of the DMRB speed bands for emissions, (rather than the more incremental EFT) , means the DMRB AQ model is particularly sensitive where speeds are near the bar e.g 19kph (heavy) to 20kph (light) results in an approximately 26% & 72 %, reduction in emissions from LDV & HDV respectively.</p> <p>National Highways stated in the April meeting that considering absolute modelled speeds in the study area the use of National Highways speed band emission factors on balance would</p>	<p>speed bands are relatively wide, so average traffic speeds can vary between the Do-minimum and Do-something scenarios, but not result in a change in speed band</p>	

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			<p>provide an overall outcome consistent with Defra EFT 10.1 had these emission factors been used.</p> <p>It is difficult to validate this statement in the absence of sensitivity analysis but generally speaking, the speed band data used on roads provided in the study area provided by NH to High Peak did, anecdotally, appear to be fairly evenly distributed across the speeds band which initially would appear to concur with NH statement.</p>		
9.18	[REP4-011]	Traffic model speeds used to derive Speed Bands used in the Air Quality Assessment	<p>HPBC still have remaining questions around the traffic model speeds that have been used to derived the speed bands used in the air quality assessment.</p> <p>HPBB response Deadline 11</p> <p>Although, the use of the speed bands is understood, the actual speed ascribed to the traffic in the study area is a function of the transport model and the assumptions and the forecast data used in this model (movement and total numbers of vehicles) is still not entirely clear.</p>	<p>The traffic modelling used for the assessment of the Scheme has been developed, calibrated and validated in accordance with Department for Transport (DfT) Transport Analysis Guidance (TAG) and has been accepted by Derbyshire County Council (DCC) as fit for purpose. Journey time validation has been included as part of the traffic model validation to ensure the traffic model speeds are robust and provide the best indication of the future situation.</p> <p>The speed band categories used in the air quality assessment are relatively wide, so</p>	Not Agreed

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			<p>As noted (in 9.19) HPBC still do not fully appreciate the criteria /logic in the Transport model that causes traffic to divert from the more direct A57 route through Glossop and use Dinting Road / Shaw lane. As one would expect perhaps the traffic to divert from routes (speed bands) that are classed as “heavily congested” to routes perceived to be less congested “e.g lightly congested or free flowing” but this is not obvious in the speed band data provided by HE.</p> <p>Therefore the confidence in the accuracy of the allocation of the speed bands (from the Transport) model is not agreed</p>	<p>average traffic speeds can vary within each speed band sufficiently to alter the relative journey times via competing routes in the traffic model without a change in the speed band. Therefore, traffic can change its choice of route in the traffic model even where speed bands on competing routes are the same in both the Do-minimum and Do-something scenarios.</p>	
9.19	[REP4-011]	Routing of traffic in Glossop from the A57 onto Shaw Lane and Dinting Road.	<p>Item 8.41 HPBC [REP4-011] has questioned the rationale for showing vehicles diverting to Shaw Lane and Dinting Road from A57 Glossop High Street and whether this undermines the assessment of receptors on the A57. HPBC have also questioned whether a change to the expected routing could potentially affect flows through the Glossop Air Quality Management Area</p> <p>HPBC Position</p>	<p>The traffic modelling used for the assessment of the Scheme has been developed, calibrated and validated in accordance with Department for Transport (DfT) Transport Analysis Guidance (TAG) and has been accepted by Derbyshire County Council (DCC) as fit for purpose. It is therefore robust and provides the best indication of how future traffic demand will use the road network in response to changes in the operation of the modelled road network due to the Scheme compared to without it, whilst</p>	Not agreed

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			<p>As noted HPBC still do not fully appreciate the criteria /logic in the Transport model that causes traffic to divert from the more direct A57 route through Glossop and use Dinting Road / Shaw lane. One would expect perhaps the traffic to divert from routes (speed bands) that are classed as “heavily congested” to routes perceived to be less congested “e.g lightly congested or free flowing” but this is not obvious in the speed band data provided by HE.</p> <p>It is not yet agreed that for the forecast model to change significantly this would require these roads to become less desirable, as it is not yet clear to us that they the likely preferred route, for the reasons raised previously on numerous occasions. The crucial question is the forecast model representing likely traffic movements (I would also note traffic numbers here). To that end and as noted above, it would be desirable to not include a sensitivity tests on traffic flow should Shaw lane / Dinting Lane not be used to the extent predicted.</p> <p>NH acknowledged at our meeting of 26th April that the model had not been calibrated to take account of on-street parking on Shaw Lane nor had the assumptions of traffic movement along (e.g limited constraints) along Shaw lane/ dinting road been validated directly.</p>	<p>accounting for forecast traffic growth and other committed future modifications to the road network.</p> <p>For the routing of traffic across the modelled road network to substantially 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 implementation that would need to consider the diversionary impact of the scheme on traffic and the consequential environmental effects.</p> <p>Consequently, the forecast traffic flows across the modelled road network are considered to represent a reasonable and appropriate worst-case scenario of the traffic impacts of the Scheme through Glossop.</p> <p>If traffic was somehow prevented or discouraged from using Dinting Road and Shaw Lane, then additional traffic modelling would need to be undertaken to understand the likely traffic</p>	

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			<p>There therefore remains concern that the model may be “overly optimistic” in its allocation of the percentage of the increased traffic as a result of the scheme onto Shaw Lane /Dinting Lane. The knock on effect of this assumption may mean that the changes in numbers as/ or speed bands, along the A57, may trigger the scoping criteria DMRB LA 105 for the assessment of the two AQMA’s</p>	<p>redistribution effects across the road network, which would not necessarily mean that traffic flows on any one alternative route, such as the A57 through Glossop (including Glossop AQMA), would increase. This is because there are likely to be wider, resulting, traffic redistribution effects.</p> <p>Consequently, National Highways do not consider it necessary or appropriate to undertake a sensitivity test.</p> <p>This issue has been further discussed with HPBC (virtual meetings held 4th March 2022 and 18th March 2022) HPBC reiterated their concern that a rerouting of traffic may trigger the need for further assessment of the Glossop AQMA and requested that a sensitivity test be carried out on the traffic modelling to understand the impact of preventing traffic using the Dinting Road and Shaw Lane diversion route.</p> <p>Further discussion on this matter has been undertaken between HPBC, Derbyshire County Council (DCC) and the Applicant’s representative for transport networks and traffic (virtual meeting held 26th April 2022).</p>	

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9.20	[REP4-011]	Inclusion of HPBC AQMAs in the air quality study area	<p>Item 8.40 HPBC [REP4-011] suggested that a variation of the screening threshold would be appropriate for links within the Air Quality Management Areas.</p> <p>HPBC's key concern remains that impact of the scheme on the designated AQMAs, should have been included on a precautionary basis; HPBC agreed that the appropriate scoping criteria for National Highway' road schemes had been used (following DMRB LA 105) in the Air Quality assessment</p> <p>However, as noted (9.19) there remains concerns over the accuracy of the traffic data used to inform the scoping criteria.</p> <p>Notably, the changes in traffic numbers and/ or changes in speed bands.</p>	<p>The traffic scoping criteria for changes in traffic flow requiring a quantitative air quality assessment as set out in the DMRB LA 105 are as follows:</p> <ul style="list-style-type: none"> • Road alignment will change by 5 m or more; or • Daily traffic flows (two way) will change by 1,000 annual average daily traffic (AADT) or more; or • Heavy Duty Vehicle (HDV) flows (two way) will change by 200 AADT or more; or • A change in speed band (for one way or two way traffic and in any time period (morning peak, interpeak, evening peak, off peak)). <p>The DMRB LA 105 provides thresholds applicable and suitable for the assessment of National Highways schemes which, as strategic interventions, impact traffic flows over a much wider area than residential and mixed used developments. This is also reflected in the difference in the nature and scale of the traffic models used for the assessment of highways schemes. The DMRB LA 105 traffic scoping criteria provides traffic change criteria as absolute values which if exceeded require quantitative assessment, which</p>	Not Agreed.

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				<p>for large projects with receptors within 50m of roads triggering the traffic scoping criteria must follow a detailed assessment approach using air dispersion modelling (as has been used in the Scheme air quality assessment). National Highways utilised the established and well tested LA 105 traffic scoping criteria for this Scheme in the same way as it has been applied on other highways DCO projects. HPBC has agreed that the appropriate scoping criteria has been used. National Highways' position is that the use of DMRB LA 105 traffic scoping criteria provides a robust and appropriate threshold for the assessment of significant effects on road links [including those] within AQMAs.</p> <p>This issue has been further discussed with HPBC (virtual meetings held 4th March 2022, 18th March 2022 and 8th April 2022). [At those meetings Derbyshire County Council, to whom HPBC defer on matters related to the traffic model such as traffic numbers and speed bands, have confirmed they are satisfied and the model is fit for purpose.] However, and notwithstanding HPBC's agreement on the use of DMRB LA 105 traffic scoping criteria, HPBC remains of the view that AQMAs should have been included in the Scheme air quality assessment contrary to the scoping</p>	

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				<p>criteria on a precautionary basis. Insofar as HPBC appreciate that DMRB has been followed but believe the AQMAs should have been assessed regardless of whether the traffic scoping criteria were triggered, National Highways and HPBC have not been able to reach agreement on this issue.</p>	
9.21	[REP4-011]	The impact of construction vehicle movements at sensitive receptors in HPBC	Item 8.35 HPBC [REP4-011 requested information on the level of construction traffic and duration for the eastern end of the link road where it connects at Woolley Bridge due to air quality receptors being within 200m.	<p>National Highways response to item 8.35 regarding both construction vehicle movements and construction traffic management is provided in Comments on Local Impact Report submitted by Derbyshire County Council and High Peak Borough Council (REP3-018).</p> <p>There are not anticipated to be any construction vehicle movements on the public highways in HPBC. When travelling off site, construction traffic is expected to travel west from the Scheme extent on public highways towards Manchester. Most construction vehicle movements on site are expected to follow the trace of the scheme alignment with a maximum of 89 daily 2-way HDV on-site movements Assuming the worst case, that all these vehicles travel to the far eastern edge of the trace alignment, where the link road connects with the existing A57 and the closest location to properties in HPBC, the number of daily HDV movements</p>	Agreed

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				<p>would not meet the DMRB LA 105 traffic scoping criteria requiring further assessment.</p> <p>The approach to the assessment of construction vehicle emissions has been further discussed and agreed with HPBC (meeting held 4th March 2022).</p>	
9.22	[REP4-011]	The impact of construction traffic management at sensitive receptors in HPBC	Item 8.36 HPBC [REP4-011] requested further information on the impact of an increase of traffic during construction would impact congestion in HPBC	<p>With respect to construction traffic management, construction phase 2 and 3 (both of 6-month duration) are expected to have the largest impact on traffic on the local highway network. The maximum AADT change on any road within HPBC as a result of traffic management measures across either phase is expected to be 144 AADT on A57 Woolley Lane and 20 HDV on the A628 Manchester Road. The traffic change does not therefore meet the DMRB LA 105 traffic scoping criteria requiring further assessment.</p> <p>The temporary traffic management measures will generally be short term, with the arrangements, timing and phasing being designed to minimise traffic congestion and delay far as reasonably practicable. Inevitably, however, some of the temporary traffic management arrangements are likely to cause some additional short term traffic congestion and delay within the</p>	Agreed

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				<p>immediate vicinity of the Scheme, but this is not anticipated to be sufficient to result in any material change in traffic flows or congestion on roads within HPBC.</p> <p>The approach to the assessment of the impact of construction traffic management has been further discussed and agreed with HPBC (meeting held 4th March 2022).</p>	
9.23	REP8-19	Human health receptors A57 Brookfield	<p>ISH 3 Item 5 Air Quality Question j Within the response to question j, HPBC raised a concern regarding the magnitude of change reported in the compliance risk assessment at qualifying feature receptors adjacent to the A57 Brookfield.</p> <p>Identification of the receptors (figure 5.4) used in the compliance risk assessment (using LAQM “conservative” forecast) indicated a “large” change at some of the receptors along Brookfield.</p> <p>However, it also highlighted that some of these were human health receptors that had not been included as receptors in the (less conservative) primary human health AQ assessment (DMRB LA 105). Therefore, HPBC have requested that these receptors are also assessed in accordance with the DMRB LA 105.</p> <p>HPBC response Deadline 11</p>	<p>Following further discussion and clarification with HPBC (virtual meeting held 8th April 2022) it was agreed that a sensitivity test would be undertaken to identify the air quality impact at relevant qualifying feature receptors located adjacent to the A57 Brookfield under the DMRB LA 105 human health assessment methodology, which gives more pessimistic future year concentrations.</p> <p>The sensitivity test identified a single receptor point (QF454), representative of a kerbside residential property, which would be expected to experience a large increase in concentrations (>4 µg/m³) resulting in a marginal exceedance of the annual mean NO₂ AQS objective in both the base year (2018) and with the Scheme in the opening year (2025) (concentration of 40.1 µg/m³ against a threshold of 40µg/m³) at the most</p>	Agreed

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			<p>Following further discussion and clarification (virtual meeting held 8th April 2022) it was agreed that a sensitivity test will be undertaken to identify the air quality impact at relevant qualifying feature receptors located adjacent to the A57 Brookfield under the DMRB LA 105 human health assessment methodology (Ref: TR010034/EXAM/9.86?)</p> <p>Results from the updated air quality assessment (DMRB LA 105) indicated a “Large increase” in NO₂ DS compared to DM in 2025, at locations along Wooley Bridge with 1 location exceeding the AQO (40µg/m³) as a result of the scheme.</p>	<p>southerly corner of the property façade. The increase in concentrations is due to an increase in traffic flow on the A57 Woolley Bridge (+4641 AADT, +261 HDV AADT) and an increase in congestion in the interpeak period for northbound traffic.</p> <p>However, monitoring data for a location representative of QF454, HPBC diffusion tube HP26, does not indicate that there was likely to be an exceedance of the AQS objective at the location in the model base year (2018 monitored annual mean of 34.5 µg/m³). It is therefore important to better understand existing air quality at the property representative of QF454 when interpreting the results of the modelling and or sensitivity test.</p> <p>DMRB LA 105 Table 2.92N provides guidance on the number of properties experiencing worsening and improvement when considering evaluation of significance, whilst paragraph 2.95.1 provides guidance on the assessment of significance where the number of properties resides between the lower and upper guideline bands provided in Table 2.92N. Given the number of receptors (75 receptors) that experience a decrease in concentrations with the Scheme, it is still considered that this outweighs the one receptor with a ‘small’ increase in</p>	

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				concentration and one receptor with a 'large' increase in concentration (QF454) with the Scheme. Overall, as reported in the ES, the impact of the Scheme is an improvement in air quality for human health receptors and there is not a significant adverse effect due to the Scheme.	
9.24	REP8-19	Human health receptors A57 Brookfield	It would be anticipated that NH would work with HPBC in identifying and addressing any deterioration in AQ as a result of the scheme. A requirement could be applied to ensure appropriate monitoring of air quality within the Brookfield (and AQMA's), post-opening of the scheme, is undertaken by the National Highways to determine if the accuracy of the predicted impact of the scheme in these areas is accurate. Should this assumption prove incorrect, National Highways should ensure that mitigation is agreed with HPBC and delivered by National Highways if necessary	The results of the sensitivity test were discussed with HPBC (virtual meeting held 27th April 2022). Discussions are ongoing regarding a mechanism for the Applicant to support HPBC to better understand the baseline air quality at the property.	Not Agreed

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10. LPA Issues					
10.1 Compliance with local policy and development plans					
10.2 Achievement of sustainable development					
10.3 Matters listed under assessment of principles					
10.4. Whether potential releases can be adequately regulated under the pollution control framework, consistent with the National Policy Statement for National Networks					

10.5 Any other relevant matters included in the ExA's Initial Assessment of Principal Issues					
10.6 Any other matters on which agreement might aid the smooth running of the Examination and assist the ExA's recommendation to the Secretary of State					

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