



Our Ref: HE551473-BBA-OSI-A57_AL_SCHEME-LN-ZM-000098

For the attention of:
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31 October 2022

By email to:
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Dear Kate Atkins

**A57 Link Roads scheme
Development Consent Order application reference: TR010034
National Highways' Response to Department for Transport Consultation letter
dated 24 October 2022**

The annex in this letter provides the response of the Applicant, National Highways, to the Secretary of State's request made in the Department for Transport's letter dated 24 October 2022 in respect to the above application.

I should be grateful if you would acknowledge safe receipt of this letter and arrange for a copy of it to be published. If you require any further information on the above, please do not hesitate to contact the Scheme Project Manager, Emma Simpson, or I on the following email address: A57LinkRoads@nationalhighways.co.uk.

Yours sincerely,


**Andrew Dawson
Senior Project Manager
A57 Link Road**

Annex

Applicants response to request for comments on CPRE Peak District and South Yorkshire Branch’s response to the Secretary of State’s letter dated 4 October 2022.

Question number	CPRE Peak District and South Yorkshire Branch response	National Highways’ response
7	<p>The cumulative impact of the A57 Link Roads with the proposed major development of Godley Green Garden Village (GGGV) was assessed superficially by the Applicant in the DCO application as insignificant. This conclusion is contrary to the evidence supporting GMCA’s Joint Development Plan ‘Places for Everyone’ (PfE), underestimates the cumulative impact of the two developments and fails to mention the substantial impacts on the M67 Jn4 and M60 Jn24. Although the former is part of the A57 Link Roads project, the latter is not and no mitigation was suggested for it by National Highways through the DCO application. We presented evidence on these matters as the Examination closed [REP12-031, 10.20, 10.23 and 10.24], but new evidence has emerged/is emerging which must be taken into consideration before a decision about the scheme can be made.</p>	<p>Please see the responses that follow which clarify how the A57 Link Roads application for development consent has appropriately considered Godley Green Garden Village (GGGV), is consistent with the evidence supporting the Places for Everyone (PfE) Joint Development Plan and explain that there is no new evidence that necessitates a delay in determining the A57 application.</p> <p>It is important to recognise that the proposed allocation of, and planning application for GGGV post-date the A57 Link Road application. As a result, the proposals for the garden village scheme are being prepared cognisant of the A57 proposals. Any adverse impacts on the Strategic Road Network (SRN) arising from the proposed development of GGGV will require mitigation to be identified and secured as part of the GGGV planning application process and should not delay the decision on the A57 Link Roads scheme. The planning statement for the GGGV¹ acknowledged that the garden village scheme anticipated a build out period of 18 years, up to 2040 (see table at paragraph 5.49) assuming a start on site in 2022; albeit this is unlikely given the application is yet to be determined. Even on the most favourable assumptions as proposed by the promoters of GGGV, only 340 of the 2,150 dwellings proposed were to be built out by 2025, being the A57 scheme opening date. The Transport Locality Assessments Addendum² produced on behalf of Tameside Metropolitan Borough Council to support the Greater Manchester Strategic Framework and the PfE plan anticipates that no development would be delivered by GGGV before 2025³.</p> <p>Notwithstanding that position, National Highways is continuing to work with Tameside Metropolitan Borough Council who are determining the planning application for the GGGV proposals and with Greater Manchester Combined Authority and Transport for Greater Manchester on wider requirements for mitigation on the SRN to support the emerging site allocations within Places for Everyone. However the consideration of any such wider mitigation that may be required is ongoing and at an early stage and again should not be a reason to delay a decision on the A57 Link Roads DCO.</p>

¹ https://publicaccess.tameside.gov.uk/online-applications/files/7824602FE2E596CC6241482724AAFCC8/pdf/21_01171_OUT-PLANNING_STATEMENT-1501785.pdf

² Systra for Tameside Metropolitan Borough Council, Transport Locality Assessments Addendum, Tameside, Places for Everyone, July 2021 <https://greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/09%20connected%20places/09.01.26%20Transport%20Locality%20Assessments%20Addendum%20-%20Tameside.pdf>

³ *ibid* see table 9 at paragraph 6.1.1

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7	<p>a) Research undertaken by TfGM whilst the A57 Link Roads scheme was undergoing its 2020 statutory consultation, showed the severe impacts the scheme would impose on the Strategic Road Network (SRN) when combined with the GGGV [REP12-028]. That research has been updated through PfE and confirms that traffic generated by GGGV - allocation JPA31 - is 'likely to result in material implications on the operation of the SRN4' at both the M67 J4 roundabout and M60 J24 Denton Island. JPA31 with the 'bypass' (Mottram Moor Link Road) would cause both the M67 J4 and the M60 J24 to operate beyond capacity. Mitigation without the bypass using partial signalisation and widening of the M67 J4 roundabout would restore operating capacity to the junction as the substantial increase in traffic accompanying the bypass would not be generated. All proposed options to mitigate congestion at M60 J24 fail to bring the junction within operating capacity, leading to continuing air pollution. These results challenge the evidence the Applicant presented to the DCO Examination.</p>	<p>At the time the environmental impact assessment for the A57 Link Road Scheme was undertaken, the GGGV was not a committed scheme, since the site for GGGV was not allocated for development in the relevant Local Plan (Tameside Unitary Development Plan - Adopted Plan 17th November 2004) and no planning application had been submitted. The methodology for assessing cumulative effects was prepared in accordance with the Planning Inspectorate's Advice Note 17⁴ and is detailed in the Environmental Statement – Chapter 15 – Cumulative Effects (section 15.4 refers) [APP-071].</p> <p>GGGV was considered neither certain nor near certain but was registered as 'reasonably foreseeable' in the A57 project Uncertainty Log. GGGV was, therefore, excluded from the core scenario traffic modelling and analysis for the A57 Link Road scheme, although it was included in the high growth scenario in accordance with DfT Transport Analysis Guidance (TAG).</p> <p>Planning applications for proposed developments are required to be supported by Transport Assessments to identify any traffic or transport related adverse impacts that they cause. The developers of those schemes, such as GGGV, are responsible for proposing and funding highway improvements to accommodate additional development generated traffic and, thereby, mitigate any identified adverse impacts. Similarly, Local Planning Authorities (LPAs) are required to consider the impacts of development on transport networks for emerging Local Plans to identify opportunities for avoiding and mitigating any adverse effects.</p> <p>Site specific Transport Assessments need to account for planned improvements to the SRN, such as the A57 Link Road scheme. Any identified improvements to the road network needed to accommodate the extra traffic forecast to be generated by Local Plans or individual developments would need to be delivered in addition to planned improvements to the SRN (such as the A57 scheme), funded directly by developers. It is not National Highways' responsibility to directly provide the additional road capacity necessary to enable delivery of Local Plans or individual developments. These points were made by National Highways during the DCO Examination, see item 9.54.31 in 'Applicants comments on Deadline 4 Submissions' [REP5-022].</p> <p>The results of the traffic assessment undertaken for the Greater Manchester Combined Authority's (GMCA) Joint Development Plan 'Places for Everyone' (PfE) do not, therefore, challenge the evidence the Applicant presented to the A57 Link Road DCO Examination. The PfE assessment needs to be considered distinct from the A57 Link Road traffic assessment, as it informs what further highway improvements are likely to be required to the SRN, in addition to the A57 scheme.</p> <p>The Transport Locality Assessments Addendum⁵ referred to by CPRE (the "Addendum") concludes that its earlier assessments in November 2020 remain robust and that the proposed allocations, which would include GGGV, are expected to be deliverable with mitigation in place⁶. The Addendum, consistent with the strategic level of an emerging plan, acknowledges that further work and a full Transport Assessment will be necessary to ensure that potential mitigation measures and site access arrangements are designed in more detail and remain appropriate as proposed allocations, such as GGGV, move through the planning</p>

⁴ Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects, Planning Inspectorate, 2019 <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-17/>

⁵ Systra for Tameside Metropolitan Borough Council, Transport Locality Assessments Addendum, Tameside, Places for Everyone, July 2021 <https://greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/09%20connected%20places/09.01.26%20Transport%20Locality%20Assessments%20Addendum%20-%20Tameside.pdf>

⁶ *ibid* at 1 Executive Summary paragraph 1.1.1 and 6.7 GMA Godley Green Village Concluding Remarks paragraphs 6.7.1 and 6.7.3.

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		<p>process⁷.</p> <p>Section 6.5 of the Addendum considers the impacts of allocating GGGV on the SRN and recognises that it is likely to result in 'material impacts' being those that will require mitigation from the promoters of GGGV. CPRE only cite table 13 on page 38 of Addendum which presents the potential impact on the SRN <i>before</i> mitigation. However table 14 on page 40 presents the potential impact <i>after</i> mitigation and shows the potential improvement with mitigation in place across the SRN compared to the reference case.</p> <p>In that context, GGGV will need to take account of already planned SRN improvements such as the A57 Link Roads scheme to demonstrate that GGGV can come forward without prejudicing those proposals. Where options for future SRN improvement is still being developed, such as at M60 Junction 24 (Denton Island), the Addendum recognises that allocations like GGGV, may potentially need to contribute towards those emerging proposals⁸.</p>
7	<p>b) National Highways submitted on 28th July 2022 a formal recommendation to TMBC's planning application 21/01171/OUT for GGGV that planning permission is not granted until October 28th 2022, it does not have confidence that there would not be a severe impact to the SRN, should this development proceed. This extends a previous recommendation not to grant permission and challenges the conclusion presented to the DCO Examination.</p>	<p>National Highways' Spatial Planning team is responsible for assessing the impact of Local Plans and individual proposed developments on the Strategic Road Network (SRN) and agreeing to and securing any required improvements to the SRN necessary to accommodate forecast additional development generated traffic. The EIA Scoping Opinion for GGGV dated 23 February 2021 records the need for the promoters of GGGV to discuss and agree the methodology of the Transport Assessment with National Highways and for engagement with Transport for Greater Manchester and National Highways to ensure traffic impacts, site accessibility and the proposed overall mitigation package are suitable⁹. Consistent with the onus on GGGV to demonstrate that its impacts on the SRN will be or can be made acceptable, the National Highways Spatial Planning team has been reviewing the information provided with the GGGV planning application.</p> <p>National Highways' responses to this application to date have stated that it does not consider the evidence is yet available to make a determination on the application. The response from National Highways dated 28 July 2022 referred to by CPRE stated:</p> <p><i>"Since our last response, additional contact has been made with the developer's transport consultants with the aim of ensuring that the evidence presented gives National Highways the confidence that there would not be a severe impact to the SRN, should this development be granted planning permission. At present we are unable to make that determination, and as such we request that this application remains on hold until the developer is able to provide sufficient evidence as to the impact of the proposals".</i></p> <p>National Highways' latest response dated 28 October 2022 confirms:</p> <p><i>"We have met with the developer's transport consultants since our last response, and they continue to develop their evidence base as part of an upcoming resubmission of the Transport Assessment. To give the applicant [GGGV] additional time to complete their report, and to ensure we have sufficient time to undertake a review, this application will need to remain on hold"</i></p>

⁷ *ibid* Executive Summary paragraph 1.1.4

⁸ *ibid* 1 Executive Summary paragraph 1.1.3 and 1.1.4 and 6.6 [GGGV] Impact of changes paragraph 6.6.3.

⁹ Chapter 12 Transport, Environmental Statement Appendix 2.2: EIA Scoping Opinion, pages 8 and 9

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		<p>and recommends the application is not determined before at least 16 December 2022.</p> <p>As set out above, should any mitigation be required to the Strategic Road Network as a result of GGGV, including to the A57(T), the work will be the responsibility of the developer of GGGV.</p>
7	<p>c) Further investigation is being undertaken by National Highways and TfGM to produce 'Highways England Future Work Programme' to inform PfE. This examines the potential implications of the plan on the SRN, including every SRN link, junction, merge and diverge arrangement across Greater Manchester. National Highways describes this work as 'of critical importance to the transport evidence base. Only when this work is completed and has been reviewed, will National Highways be able to understand the impacts of Plan on the strategic road network'. Thus, this work appears crucial to informing and evaluating the authenticity of the assessment of the A57 Link Roads.</p>	<p>The document titled 'Highways England's Future Works Programme' was produced by Systra on behalf of Transport for Greater Manchester (TfGM) to inform TfGM about the potential work that may be required to the SRN to facilitate the development proposals set out within the Greater Manchester Joint Spatial Plan 'Places for Everyone' (PfE).</p> <p>National Highways can clarify that the document titled 'Highways England's Future Works Programme' is not a document that National Highways has authored, nor has National Highways contributed to that document. However, the findings of the document have led directly into the Statement of Common Ground (SoCG)¹⁰, signed by National Highways and the nine Greater Manchester local authorities participating in the joint spatial plan, including Tameside Metropolitan Borough Council. In relation to the transport evidence supporting the Places for Everyone Plan (PfE), paragraph 3.2 of the SoCG records:</p> <p><i>"Given the strategic nature of the Places for Everyone Plan, and the geographic extent of the SRN affected by the Plan, it is understood and accepted that there is a need to commit to additional assessment work through the planning process. This will assist in developing a more detailed understanding of the impacts of development on the SRN and adjacent local highway network as growth comes forward in each District within the Plan period".</i></p> <p>For the avoidance of doubt the assessments completed to support the A57 Link Roads scheme and the PfE have been appropriate for their respective purposes and are not awaiting the completion of further work. All stakeholders to the PfE and National Highways recognise that further detailed transport assessments to consider site specific impacts and the identification of any required mitigation to the SRN will need to be considered by the promoters of site allocations as part of the planning process. This position is entirely consistent with the position identified at b) above.</p>
7	<p>The inconsistency between National Highways' and TfGM's evidence as to the cumulative impacts of the A57 Link Roads with GGGV must be resolved. The completed Highways England Future Work Programme, and a full and proper assessment of the cumulative impacts of GGGV with the A57 Link Roads should be available for scrutiny by IPs and yourself as the decision-maker before a decision is made about the A57 Link Roads. This is reinforced by what we demonstrated about the traffic modelling as outlined in paragraph 2 above</p>	<p>Without repeating the responses provided above, the respective assessments completed by National Highways as part of the A57 Link Road scheme and by the LPAs promoting the PfE, have been appropriately completed and do not contain the inconsistencies suggested.</p> <p>National Highways respectfully suggests that the Secretary of State can proceed to determine the A57 Link Roads application for development consent in the knowledge that the application is supported by an appropriate Environmental Statement that has considered cumulative effects in accordance with legislative requirements and Planning Inspectorate guidance. The requirement for the promoters of GGGV to complete a site-specific Transport Assessment which assesses the impacts of that site on the SRN and identify any required mitigation, is consistent with the approach presented as part of the examination of the A57 application for development consent and the PfE plan process.</p> <p>National Highways has and continues to engage with the promoters of GGGV and Tameside Metropolitan</p>

¹⁰ <https://www.hwa.uk.com/site/wp-content/uploads/2022/03/Matter-3.1.1-National-Highways-Statement-of-Common-Ground.pdf>

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		<p>Borough Council as part of the extant planning application for GGGV and has issued appropriate holding objections whilst the promoters prepare to update and resubmit their Transport Assessment. In the unlikely event that Tameside elected to determine the application before the expiry of the period identified in a holding objection lodged by National Highways, Tameside would be required to consult with the Secretary of State and would be unable to determine the application until that consultation process was complete¹¹.</p>

¹¹ Town and Country Planning (Development Affecting Trunk Roads) Direction 2018.