

M60/M62/M66 Simister Island Interchange

TR010064

7.3 DRAFT NATIONAL POLICY STATEMENT FOR NATIONAL NETWORKS ACCORDANCE TABLES

APFP Regulation 5(2)(q)

Planning Act 2008

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

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

M60/M62/M66 Simister Island Interchange
Development Consent Order 202[]

**DRAFT NATIONAL POLICY STATEMENT FOR NATIONAL NETWORKS
ACCORDANCE TABLES**

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CONTENTS

1	Introduction	1
1.1	Purpose of the Document	1

1 Introduction

1.1 Purpose of the Document

- 1.1.1 This Draft National Policy Statement for National Networks (Draft NPS NN) Accordance Table (this “Accordance Table”) relates to an application made by National Highways (the “Applicant”) to the Secretary of State for Transport via the Planning Inspectorate (the “Inspectorate”) under the Planning Act 2008 (the “2008 Act”) for a Development Consent Order (DCO). If made, the DCO would grant consent for the M60/M62/M66 Simister Island Interchange (the “Scheme”). A detailed description of the Scheme can be found in Chapter 2, The Scheme of the Environmental Statement (TR010064/APP/6.1)
- 1.1.2 The National Planning Statement for National Networks (NPS NN) sets out Government policies in respect of the delivery of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of NSIPs, and the basis for the examination by the Examining Authority and decisions by the Secretary of State for Transport. Further details about the NPS NN can be found in the Case for the Scheme (TR010064/APP/7.1). A draft NPS NN was published by the Government for consultation in March 2023 which concluded in June 2023. The draft NPS NN has yet to be designated but may still be an important and relevant consideration by the Secretary of State for Transport when determining their decision. The Scheme’s compliance with the draft NPS NN is set out in this Accordance Table. This Accordance Table forms part of a suite of application documentation and is included in the Application in compliance with Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 which require: “5(2)(q) any other documents considered necessary to support the application”.
- 1.1.3 This Accordance Table provides an assessment of the Scheme’s strategic alignment and conformity with the draft NPS NN. The Accordance Table is set out as follows:
- Table 1: Scheme conformity with the draft NPS NN Chapter 4 – Assessment principles.
 - Table 2: Scheme conformity with the draft NPS NN Chapter 5 – Generic impacts.
- 1.1.4 The Accordance Table references other relevant documentation submitted as part of the Application and provides a summary where appropriate. The following documents and assessments have been used to inform the completion of the Accordance Table:
- Draft Development Consent Order (TR010064/APP/3.1).
 - Consents and Agreement Position Statement (TR010064/APP/3.3).

- Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes (TR010064/APP/ 5.2).
- Environmental Statement (TR010064/APP/6.1).
- Environmental Statement Figures (TR010064/APP/6.2).
- Environmental Statement Appendices (TR010064/APP/6.3).
- Flood Risk Assessment Report, Appendix 13.6 of the Environmental Statement Appendices (TR010064/APP/6.3).
- Habitats Regulations Assessment Report Appendix 8.13 of the Environmental Statement Appendices.
- Case for the Scheme (TR010064/APP/7.1).
- First Iteration Environmental Management Plan (TR010064/APP/6.5).
- Statement Relating to Statutory Nuisance (TR010064/APP/6.8).

Draft National Policy Statement for National Networks (NPS NN) – March 2023

Accordance Tables with the Draft NPS NN

Chapter 4 – General policies and considerations

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
General principles of assessment		
4.2	Subject to the detailed policies and protections in this National Policy Statement (NPS) and the legal constraints set out in the Planning Act 2008, there is a presumption in favour of granting development consent for national networks Nationally Significant Infrastructure Projects (NSIPs) that fall within the need for infrastructure established in this NPS. The statutory framework for deciding NSIP applications where there is a relevant designated NPS set out in section 104 of the Planning Act 2008.	This Accordance Table sets out the assessment for the Scheme against the requirements of the draft NSP NN, and also provides details on the assessments contained within the relevant DCO documents to demonstrate compliance with the draft NPS NN.
4.3	<p>In considering the proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:</p> <ul style="list-style-type: none"> • its potential benefits, including faster and more reliable journey times, the facilitation of economic development, including job creation, reducing geographical disparities, connectivity, housing, social and environmental 	<p>The Scheme is identified in the Government Road Investment Strategy 2 (2020–2025) (RIS2) and National Highways ‘corresponding delivery plan (further details can be found in the Funding Statement (TR010064/APP/4.2)) which sets out a long-term vision for the strategic highway network in the England.</p> <p>The main objectives of the Scheme are to:</p> <ul style="list-style-type: none"> • Improve the journey experience for users of this section of our network by: <ul style="list-style-type: none"> ○ Reducing congestion at peak times. ○ Reducing journey times. ○ Delivering more reliable journey times.

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	<p>improvement, and any long-term or wider benefits;</p> <ul style="list-style-type: none"> its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate, or compensate for any adverse impacts. 	<ul style="list-style-type: none"> Provide a Scheme that is safe for all road users. Minimise the impact of the Scheme on the surrounding environment including within Noise Important Areas and Air Quality Management Areas. Support future economic growth across the Greater Manchester area by delivering against local aspirations set out in regional and local authorities transport strategies and local plans. <p>The benefits of the Scheme are:</p> <ul style="list-style-type: none"> With the Scheme in place a reduction in delay and journey time is forecast for routes through the Scheme area. In turn this will attract some additional traffic to the Strategic Road Network (“SRN”) around the Scheme. These increases will be from a combination of reassignment from the Local Road Network (“LRN”), traffic switching the junctions used to access the M60 and variable demand effects as traffic seeks to take advantage of the extra capacity provided by the Scheme. The Scheme will help relieve traffic congestion and improve the journey experience for motorists at M60 Junction 18. Traffic wanting to travel eastbound to southbound on the M60 will use the new Northern Loop instead of the M60 Junction 18 circulatory thereby significantly reducing traffic flows on the Junction 18 circulatory and freeing up capacity for other movements at the junction. In addition, the Scheme will provide additional capacity between M60 Junction 17 and Junction 18 with the provision of a dual 5-lane motorway, providing five lanes in both directions and reducing delays associated with merging and diverging traffic. <p>The Case for the Scheme (TR010064/APP/7.1) provides further detail on how the Scheme meets the above objectives and the benefits the Scheme will bring.</p>

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		<p>Do Minimum (without the Scheme) and Do Something (with the Scheme) traffic forecasts have been produced for forecast years 2029 (Opening Year), 2044 (Design Year) and 2061 (Future Year). The forecast models indicate that increases in traffic are forecast throughout the study area over time. Without the Scheme, the forecasted traffic growth will result in increased journey times and delays.</p> <p>Without the Scheme almost all journey times are forecast to increase over time due to traffic demand. This situation will be reversed with the Scheme in place, with most journey times forecast to improve. Traffic using the Northern Loop will save up to 1.5 minutes with the Scheme compared to the current junction layout. Further details are available in the Transport Assessment (TR010064/APP/7.4).</p> <p>Over the 60-year appraisal period, the Scheme is forecast to lead to a reduction in 9 accidents. However, the number of fatal, serious and slight casualties are forecast to increase slightly. This is due to the accidents that do occur having more casualties as drivers reroute from local roads to higher speed strategic roads to take advantage of the Scheme benefits.</p> <p>As more people will use the Scheme this means overall there will be more users and more miles will be driven. The casualties per billion vehicle kilometres have been calculated across the assessment area, this shows that the risk of accident and the risk of a personal injury accident (“PIA”) is reduced for each driver due to the Scheme. Further details can be found in paragraph 6.4.8 of the Transport Assessment (TR010064/APP/7.4).</p> <p>The design of the Scheme has sought to minimise the impacts on the environment through:</p>

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		<ul style="list-style-type: none"> • Biodiversity Net Gain (BNG). The Scheme will deliver BNG (as set out in Appendix 8.12, Biodiversity Net Gain Report of the Environmental Statement Appendices (TR0010064/APP/6.3). • Significant adverse effects for the construction and operational phases of the Scheme will be minimised through a comprehensive approach to mitigation. This is outlined throughout the topic specific chapters of the Environmental Statement (TR010064/APP/6.1). • Specific measures to minimise construction impacts are set out in a Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan (TR010064/APP/6.5). • Noise Important Areas (“NIAs”) are shown on Figure 11.2, Noise Sensitive Receptors] of the Environmental Statement Figures (TR010064/APP/6.2) and predicted levels of noise change presented in Chapter 11, Noise and Vibration of the Environmental Statement (TR010064/APP/6.1). There are five NIA’s within 600m of the Order Limits. Three of them are directly adjacent to the motorway network, and the remaining two located adjacent to the local road network on Bury New Road and Higher Lane. There are predicted reductions of up to 5.1dB in road traffic noise levels for some receptors within the NIA reference number 1671 (which is adjacent to the M60 between Junction 17 and Junction 18) that, in the short-term, will be noticeable and considered to be a likely significant beneficial effect. There are no other changes in road traffic noise of greater than 1dB predicted within other NIAs. • Mitigation has reduced the overall effect of construction noise and vibration at many properties, however, significant adverse impacts are still reported for a number of residual properties close to the Order Limits or which are close to diversion routes when the motorway is closed during night time working. • Night time working is required for construction to maintain the operation of the motorway and for the safety of workers. An Outline Noise and Vibration Management Plan is provided at Appendix B of the First

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		<p>Iteration Environmental Management Plan (TR010064/APP/6.5) Which sets out the measures to manage noise during construction. The Outline Noise and Vibration Plan will be developed into the Noise and Vibration Plan as part of the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010053/APP/3.1). The Applicant will investigate additional mitigation during detailed design to further reduce these impacts and the contractor will work closely with the community to develop this further.</p> <ul style="list-style-type: none"> • The Scheme is located almost entirely in the Bury Air Quality Management Area (“AQMA”) which forms part of the Greater Manchester Community Area AQMA and was declared for exceedances of the Nitrogen Oxide Air Quality Objective in 2016. A proposed Clean Air Zone (“CAZ”) to tackle these exceedances is still under review. Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1) outlines the technical engagement that has taken place with Bury Metropolitan Borough Council to prepare air quality models. The residual potential effect of the Scheme to exceed relevant Limit Values concludes that no new exceedances of air quality or a further deterioration of existing exceedances will be experienced as part of the Scheme. There are no significant effects at modelled human health receptors and on Limit Value and target compliance receptors from road transport for both the construction and operation of the Scheme. • An Outline Air Quality and Dust Management Plan at Appendix A of the First Iteration Environmental Management Plan (TR010064/APP/6.3) sets out the measures to be used during construction to manage dust other air quality effects which will reduce the impacts on sensitive human and ecologically receptors. The Outline Air Quality and Dust Management Plan will be developed into the Air Quality and Dust Management Plan as part of the Second Iteration for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).

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		<p>The Scheme is a Nationally Significant Infrastructure Project (NSIP) and will improve connectivity across the SRN network as well as across Greater Manchester. This aligns with the overall spatial strategy for the emerging Places for Everyone (which once adopted will form part of the local development plan), as it improves connectivity across the sub-region and provides additional capacity on the SRN to accommodate predicted future increases in traffic and support economic growth in the Greater Manchester Area.</p>
4.4	<p>Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate requirements in the Development Consent Order. If development consent is granted for a proposal and a later stage the applicant wishes, for technical or commercial reasons, to construct it in such a way that it is outside the terms of what has been consented (for example, because its extents will be greater than has been provided for in terms of the consent), it will be necessary to apply for a change to be made to the Development Consent Order. The application to change consent should in line with the government's guidance on the procedures for making a change to a Development Consent Order for NSIPs and may need to be accompanied by environmental information to supplement that which was included in the original environmental assessment.</p>	<p>The Scheme design which forms the application for development consent is a 'preliminary design' to allow a reasonable degree of flexibility and which may be subject to some design refinement as the detailed design is completed, in accordance with subject to the Requirement 2 in Schedule 2 of the draft Development Consent Order (TR010060/APP/3.1).</p> <p>The draft Development Consent Order (TR010060/APP/3.1) provides at Article 6 limits of deviation both laterally and vertically. These limits have been included in the Scheme in order to allow a necessary, but proportionate, degree of flexibility to facilitate the detailed design and construction phases of the Scheme. The limits of deviation have been considered when undertaking all technical assessments in relation to the Scheme. This will minimise the need for the Applicant to seek a change to the made Development Consent Order, The Applicant recognises that, if such a change was required, there may be a need for this to be accompanied by environmental information.</p> <p>Chapter 4: Environmental Assessment Methodology of the Environmental Statement (TR010060/APP/6.1) sets out the assessment methodology and approach taken to prepare the environmental impact assessment. This includes details of how the Scheme has been assessed where information was not available to inform the assessment. In addition, each of the technical chapters gives a description of the assumptions made and the limitations of the assessment.</p>

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Business Case		
4.5	<p>Applications for road and rail projects (with the exception of those for strategic freight interchanges) will normally be supported by a business case prepared in accordance with Treasury Green Book principles and the Department's Transport Business Case guidance and Transport Analysis Guidance. Transport Appraisal Guidance assesses the cost, benefits, and risks of alternative ways to meet government objectives. It helps decision makers to understand the potential effects, trade-offs, and overall impact of options by providing objective evidence base for decision making. The purpose of the economic dimension of the business case is to identify the proposal that delivers best public value to society, including wider social and environmental benefits; however, the economic case is one of five cases that comprise the business case, and government decisions are based on all five. The information provided will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State's consideration of the benefits and adverse impacts of a proposed development. It is expected schemes brought forward through the Development Consent Order process by virtue of section</p>	<p>A business case has been prepared for the Scheme in line with the Treasury Green Book Principles and Department for Transport WebTAG guidance. The economic case for the Scheme (which forms part of the business case) considers the appraisal of economic, environmental and social impacts of the Scheme. Chapter 5 of the Case for the Scheme (TR010064/APP/7.1) sets out the transport and economic case included in the business case as well as the benefits of the Scheme. The economic appraisal of the Scheme has been prepared in accordance with the Green Book – Appraisal and Evaluation in Central Government (the Green Book). The economic appraisal undertaken by the Applicant is used to demonstrate whether the Scheme is likely to represent value for money. As set out in Chapter 5 of the Case for the Scheme, the appraisal estimates the monetised benefits and disbenefits of the Scheme and compares them to the cost of the Scheme. This is presented in terms of a Benefit to Cost Ratio (BCR). Benefits and disbenefits that cannot be monetised are also assessed and taken into account when determining the Schemes overall value for money.</p> <p>Paragraph 5.6.1 of the Case for the Scheme (TR010064/APP/7.1) concludes that, taking account of the wider impacts of the Scheme and journey time reliability benefits, the Scheme has an adjusted BCR of 1.17 (which means that for £1 spent on the Scheme there will be a £1.17 return to society in benefits) when compared to a Present Value of Costs of £117.3 million. Impacts which cannot be monetised have also been considered. These include:</p> <ul style="list-style-type: none"> • Slight adverse impacts on landscape, historic environment and water environment. • A neutral impact on biodiversity, physical, security, severance and options and values. • Moderate and slight beneficial impacts for journey quality and access to services.

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	35 of the Planning Act 2008, should also meet this requirement.	The Scheme is an NSIP as defined under s22(3) of the Planning Act, 2008 ("the 2008 Act). Therefore, section 35 does not apply.
4.6	The Department's Transport Appraisal Guidance is updated regularly. This is to allow the evidence used to inform decision-making to be up to date. Where updates are made during the course of preparing analytical work, the updated guidance is only expected to be used where it would be material to the investment decision and in proportion to the scale of the investment and its impacts.	See the response in draft NPS NN paragraph 4.5 and draft NPS NN paragraph 4.7.
Local Transport Model		
4.7	Applications for road and rail projects should be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The modelling will usually include national level factors around the key drivers of transport demand such as economic growth, demographic change, travel costs and labour market participation, as well as local factors. The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around key drivers of transport demand. An assessment of benefits and costs of schemes under a range of scenarios should reflect future uncertainty, in addition to the	A local transport model has been produced for the Scheme in line with Department for Transport guidelines. The modelling has considered key drivers of transport demand including economic growth, demographic change, travel costs and labour market participants. Core high growth (optimistic) and low growth (pessimistic) scenarios have been modelled. Further details can be found in the Transport Assessment (TR010064/APP/7.4).

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	<p>core case. The modelling should be proportionate to the scale of the scheme and include appropriate sensitivity analysis to consider the impact of uncertainty on project impacts.</p>	
Wider Strategies		
4.9	<p>The Examining Authority should only recommend, and the Secretary of State should only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. Development consent obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development. Community Infrastructure Levy (or any successor to it) may also be payable on NSIP applications.</p>	<p>Schedule 2 of the draft Development Consent Order (TR010064/APP/3.1) includes requirements that are necessary, relevant to planning, enforceable, precise and reasonable in all other respects.</p> <p>The Explanatory Memorandum (TR010064/APP/3.2) explains the purpose and effect of each provision set out in the draft Development Consent Order.</p>
Environmental Assessment		
<p>Note: <i>The government has announced plans to bring forward legislation to replace the existing EU-generated systems of Environmental Impact Assessment and Strategic Environmental Assessment with a domestic framework of environmental assessment. The new system would be brought forward through subsequent regulations following further consultation. Environmental assessment would still be required and if introduced relevant plans</i></p>		

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<i>and projects would have to comply with such regulations. Until a new system is implemented, current legislation on environmental assessment continues to apply.</i>		
4.10	NSIP applications need to include an environmental assessment. This assessment is undertaken under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) framework which requires project to be accompanied by an Environmental Statement. Regulations 14 of and Schedule 4 to the Environmental Impact Assessment (EIA) Regulations set out the information that should be included in the environmental statement.	<p>The application is accompanied by an Environmental Statement (TR010064/APP/6.1) which details the likely significant effects of the Scheme on the environment and where necessary mitigation measures to avoid, prevent, reduce and if possible, offset any identified adverse effects. Chapter 15, Cumulative Effects Assessment of the Environmental Statement assesses the combined effects of the Scheme with other developments. This meets the requirements of the European Union Directive.</p> <p>The scope of the Environmental Statement (TR010064/APP/6.1) complies with the Planning Inspectorate Scoping Opinion (TR010064/APP/6.7) for the Scheme.</p>
4.11	A key part of the environmental assessment is the consideration of cumulative effects. The applicant should provide information on how the effects of the proposals would combine and interact with the effects of other developments, where relevant. For most practical purposes this means the applicant should consider the impact of other existing and committed developments within an appropriate geographical area and assess the additional impact of their own development. Other evidence, for example, from a Transport Business Case, appraisals of sustainability of relevant NPSs or strategic environmental assessment of development	Chapter 15, Assessment of Cumulative Effects of the Environmental Statement (TR010064/APP/6.1) identified no significant cumulative adverse effects of the Scheme in combination with other past, present and reasonably foreseeable developments.

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	<p>plans, may assist the Secretary of State in reaching decisions on proposals and on mitigation measures that may be required. The Secretary of State should consider how the accumulation of, and interrelationship between, effects identified in the environmental assessment might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.</p>	
<p>Habitat regulation assessments for internationally important sites</p>		
<p>Note: <i>The government’s “Nature Recovery Green Paper: Protected Sites and Species”, consulted on changes to the Habitats Regulation Assessment process. If changes are made, relevant plans and projects would have to comply with such relevant regulations. Until a new process is implemented, current legislation continues to apply.</i></p>		
<p>4.12</p>	<p>Under the Habitats Regulations, the Secretary of State must consider whether it is possible that a plan or project could likely have a significant effect (either alone or in combination with other plans or projects) on a protected site which forms part of the UK National Site Network (Special Areas of Conservation and Special Protection Areas) or on any site to which the same protection is applied as a matter of policy (i.e. listed or proposed Ramsar sites, possible Special Areas of Conservation, and sites used to</p>	<p>The Applicant has consulted and engaged with Natural England regarding the Habitats Regulation Assessment (HRA) for the Scheme. Rochdale Canal Special Area of Conservation (SAC) was scoped into the assessment and Appendix 8.13, Habitats Regulation Assessment Report of the Environmental Statement Appendices (TR010064/APP/6.3) reports the results of the Stage 1 Screening, determining the likely significant effects on European sites, and the Stage 2 Statement to Inform an Appropriate Assessment, assessing adverse effects on the integrity of European sites as a result of the Scheme.</p> <p>The Stage 2 Statement to Inform an Appropriate Assessment concludes, beyond reasonable scientific doubt, that the Scheme will not adversely affect the integrity</p>

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	<p>compensate for adverse effects of habitat sites). The term 'habitat sites' is used to refer collectively to such sites throughout this NPS. Such an assessment should be made with due regard to the conservation objectives of any relevant habitat site(s).</p>	<p>of the Rochdale Canal SAC during its construction or operational phases, either alone or in combination with other plans or projects.</p> <p>The Applicant has concluded there will be no adverse effects on the integrity of any European site, and accordingly there is no requirement for consideration of derogation at Stage 3.</p> <p>Appendix 8.13: Habitats Regulations Assessment Report of the ES Appendices (TR010064/APP/6.3) has been shared with Natural England for their review and feedback and Natural England have confirmed that they agree with the conclusions of the HRA and have no further comments.</p>
4.13	<p>The applicant should seek early advice of the appropriate Statutory Nature Conservation Body and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether or not the plan or project should proceed to the Appropriate Assessment stage of the Habitats Regulation Assessment.</p>	<p>See response in relation to draft NPS NN paragraph 4.12 above.</p>
4.14	<p>Where a proposed plan or project is considered likely to have a significant effect on a habitat site, the applicant must provide sufficient information with the application to enable the Secretary of State to make an appropriate assessment of these likely effects in view of the site's conservation objectives. The assessment may consider the effect of any mitigation measures and the Statutory Nature Conservation Body must be formally consulted on the</p>	<p>See the response to draft NPS NN paragraph 4.12. An Evidence Plan does not need to be produced for the Scheme.</p>

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	<p>assessment and its advice considered. The applicant should also consider agreeing an Evidence Plan with the Statutory Nature Conservation Body to help determine the information required.</p>	
4.15	<p>Such plans or projects may only proceed if the assessment concludes they will not adversely affect the integrity of the site or, notwithstanding a negative assessment, there are no alternative solutions, and they must provide for imperative reasons of overriding public interest. The applicant must demonstrate that they have sought advice from the Statutory Nature Conservation Body on whether the proposed compensation is appropriate to maintain the overall coherence of the National Sites Network. They must also show that the compensation is secured or provide an indication as to how it can be secured to maintain the overall coherence of the National Sites Network. Provision of such information will not be taken as an acceptance of adverse effects on integrity and if an applicant disputes the likelihood of adverse effects, it can provide this information without prejudice to the Secretary of State's final decision on the effects of the potential development on the habitats site. If, in these circumstances, the applicant does not supply information required for the assessment of a potential</p>	<p>See the response to draft NPS NN paragraph 4.12. An Evidence Plan does not need to be produced for the Scheme.</p>

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	derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination.	
4.16	During the pre-application stage, and without prejudice to the formal Habitats Regulation Assessment of the submitted plan or project, if the Statutory Nature Conservation Body gives an early indication that, irrespective of any anticipated mitigation measures, the proposed development is highly likely to lead to adverse effects on the integrity of one or more habitats sites, the applicant must include in their application such information required to assess a potential derogation under the Habitat Regulations.	See the response to draft NPS NN paragraphs 4.12. The Scheme will not give rise to any potential derogation under the Habitat Regulations.
Alternatives		
4.17	<p>Applicants should comply with all legal requirements, and any policy requirements set out in this NPS, on the assessment of alternatives. For example, current requirements include:</p> <ul style="list-style-type: none"> The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires projects with significant environmental effects to 	<p>Chapter 2 of the Case for the Scheme (TR010064/APP/7.1) and Chapter 3 Assessment of Alternatives of the Environmental Statement (TR010064/APP/6.1) set out the main Scheme alternatives that have been considered before determining the preferred option. The Consultation Report (TR010064/APP/5.1) sets out the options consulted on as part of the options consultation.</p> <p>Appendix 8.13, Habitats Regulation Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) concludes that no likely significant effects on any sites within the National Site Network (the collective name for Special Conservation Areas, Special Protection Areas and Ramsar sites) are</p>

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	<p>include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects;</p> <ul style="list-style-type: none"> • There may also be other specific legal requirements for the consideration of alternatives, for example, under the Conservation of Habitats and Species Regulations 2017 (as amended) and Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 • There may also be policy requirements in the NPS, for example, flood risk sequential test and the assessment of alternatives for developments in National Parks, the Broads, and Areas of Outstanding Natural Beauty (AONB) – where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternative considered, in compliance with these requirements and in a proportionate manner. 	<p>anticipated, when considered alone or in combination with “<i>other plans or projects</i>”. Therefore, no consideration of alternatives is required.</p> <p>Through the assessment stages outlined in Appendix 13.1: Water Framework Directive Compliance Assessment Report of the Environmental Statement Appendices (TR/010064/APP/6.3) it is considered that the Scheme will be compliant with the Water Framework Regulations for all designated water bodies assessed. Through the implementation of mitigation measures during construction and operation of the Scheme, any adverse impacts are unlikely to lead to deterioration in classification and/or prevent the water quality elements from either achieving good classification or achieving their River Basin Management Plan objectives.</p> <p>A Flood Risk Assessment has been undertaken and can be found at Appendix 13.6 of the Environmental Statement Appendices (TR010064/APP/6.3). The assessment concluded that the Scheme is at a low risk of flooding and will increase the risk of flooding elsewhere. Therefore, the sequential test has been met and the exception text does not need to be applied.</p>
4.18	National road or rail schemes that have been identified in relevant Road or Rail Investment Strategies will have been subject to an options appraisal process where relevant in line with existing Transport Appraisal Guidance, and proportionate consideration of alternatives will have been	<p>In March 2020, the Government published the 2020-2025 Road Investment Strategy 2 (RIS2), (Department for Transport (DfT), 2020) which covers investment in, and management of, the Strategic Road Network (SRN) from April 2020 to March 2025.</p> <p>RIS2 commits £27.4 billion of government spending to deliver improvements in the capacity and quality of the SRN between financial year 2020/21 to 2024/25. It sets out the standard that the Applicant must meet and identifies the Scheme</p>

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	<p>undertaken as part of the investment decision making process. The options appraisal may include other viable options for achieving the objectives of the project, including (where appropriate) other modes of travel, regulation, or other ways of influencing behaviour in line with Department for Transport guidance. The Examining Authority and the Secretary of State should satisfy themselves that the options appraisal process has been undertaken.</p>	<p>for which funding will be made available and that the Government expects will be built. The Scheme is a committed scheme in the Investment Plan contained in Part 3 (d) of RIS2:</p> <p><i>'M60/M62/M66 Simister Island Interchange – improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester that improves the traffic flow on the M60'.</i></p> <p>RIS 2 is supported by a separate Analysis Overview report developed by the DfT. This has informed the Strategic Vision, the development of the performance framework and has played a key part in supporting decisions on how much to invest, what to invest in and the timing of investment.</p>
4.19	<p>Where an options appraisal process has been undertaken, it should not be necessary to consider alternatives except where para 4,17 applies or in the wholly exceptional circumstances where case law would require consideration of alternatives as the proposed development involves such obvious adverse effects that the possibility of an alternative site or an alternative location within the site proposed by the applicant avoiding such adverse effects becomes a relevant planning consideration. In those exceptional circumstances where alternatives might be relevant, consideration of them should be proportionate. Where alternative schemes proposed are vague or inchoate, or have no real possibility of coming about, they are either irrelevant, or where relevant, will be given little or no weight, and the extent to which they are</p>	<p>The Scheme has been the subject of a full options appraisal prior to inclusion in the RIS2 including the assessment of alternative transport modes. The Case for the Scheme (TR010064/APP/7.1) outlines the history of the Scheme development including the options considered and determination of the preferred option which forms the application for development consent.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	considered should be determined accordingly.	
Biodiversity net gain		
4.20	Biodiversity net gain is an approach to development that delivers measurable improvements for biodiversity by creating or enhancing habitats in association with developments. Applicants should therefore not just look to mitigate direct harms, but also to identify and deliver opportunities for nature recovery and wider environmental opportunities by providing net gains for biodiversity.	<p>The Environment Act 2021 was given Royal Assent on 9 November 2021. This Act contains provisions for the protection and improvement of the environment, including biodiversity. The biodiversity net gain (BNG) objective is that the biodiversity value attributable to a scheme must exceed the pre-development value by at least 10%. This post-scheme biodiversity value may comprise onsite habitat, any offsite biodiversity gain and any biodiversity credits. The overall effect has to be a net gain offset against any harm to biodiversity.</p> <p>Following a transition period, the Environment Act 2021 will mandate NSIPs will be required to deliver no less than 10% BNG. This will be measured using a version of Natural England’s Biodiversity Metric adopted as the statutory Metric once mandatory BNG comes into force for application sought under the Town and Country Planning Act on the 12 February 2024. The Environment Act 2021 is underpinned by secondary legislation which was issued on the 29 November 2023, The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024, The Biodiversity Gain Requirements (Exemptions) Regulations 2024, The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and The Biodiversity Gain Site Register Regulations (2024). However, BNG will not be mandatory for NSIPs from 12 February 2024, and it is expected the transition period for NSIPs is likely to come to an end in November 2025 for those application which are not yet in examination, by which time a ‘biodiversity gain statement’ or statements will have been brought forward and agreed in Parliament setting out the Biodiversity Gain Objective (the percentage BNG target, required to be delivered by NSIPs). This is expected to be a minimum of 10%.</p> <p>Whilst there is no current legal requirement for the Scheme to provide BNG, the Scheme has been proactive in applying the Biodiversity Metric to assess measurable changes in biodiversity. The Scheme aims to provide a net gain in</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>biodiversity. Therefore, although not yet required to do so by the 2008 Act, the Scheme will deliver BNG.</p> <p>Chapter 8 Biodiversity of the Environmental Statement (TR010064/APP/6.1) set out measures which will provide enhancements both of habitats, and for protected and notable species. Implementation of Figure 2.3: Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) will provide a net gain in the biodiversity value of the site, with a 3.68% gain in habitats and a 58.50% gain in hedgerows as measured by Metric 3.1 (see Appendix 8.12 Biodiversity Net Gain Report of the Environmental Statement Appendices (TR010064/APP/6.3)). See draft NPS NN paragraph 4.21 below for an explanation of why Metric 3.1 has been used to calculate BNG.</p>
4.21	<p>Applicants should use the most appropriate version of the Department of Environment, Food and Rural Affairs (Defra) biodiversity metric (as advised by Defra) to calculate their biodiversity baseline and inform their biodiversity net gain outcomes, and to present this data as part of their application. Biodiversity net gain should be applied in conjunction with the mitigation hierarchy and does not change or replace existing environmental obligations.</p>	<p>The latest version of the Biodiversity Metric, the statutory metric, was published on 15 December 2023. Natural England advice is that the same version of the Biodiversity Metric should be used throughout the duration of the Scheme. This is because using an updated version of the tool is not simply a case of using the same numbers in a different calculator tool, as the advice regarding how the data is compiled and applied differs between different versions. As such, results from one version to another cannot be compared. The Applicant has therefore continued to use Biodiversity Metric 3.1, which is the version of the tool first used to calculate BNG for the Scheme.</p> <p>A Statement of Common Ground with Natural England is being prepared which will be submitted to the Examining Authority during the course of the examination into the application for development consent.</p>
4.22	<p>Biodiversity net gain can be delivered onsite or wholly or partially off-site and should also be set out within the application for development consent. When delivering biodiversity net gain off-site, development should do this in a manner that best contributes to the achievement of relevant</p>	<p>The baseline for BNG is assessed on-site and will be delivered within the Order Limits. No off-site BNG is proposed.</p> <p>Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) visually presents the BNG.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>wider strategic outcomes, for example, by increasing habitat connectivity or enhancing other ecosystem service outcomes. Reference should be made to any Local Nature Recovery Strategy (which should be the primary reference point for those delivery biodiversity net gain off-site) and other relevant national and local plans and strategies, such as green infrastructure strategies, used to inform Biodiversity net gain delivery.</p>	
4.23	<p>A government Biodiversity Gain Statement will set out the concept for Biodiversity net gain for NSIPs. The Secretary of State will need to be satisfied that the biodiversity gain objective in any relevant biodiversity gain statement has been met.</p>	<p>See the response to draft NPS NN paragraph 4.20.</p>
<p>Criteria for good design for national network infrastructure</p>		
4.24	<p>Applicants should include design as an integral consideration from the outset of the proposal. Applying good design to national networks projects should not be limited to general aesthetics. High quality and inclusive design goes far beyond aesthetic considerations. It demonstrates an understanding of context, local needs, history and culture, enhances local</p>	<p>The Scheme Design Report (TR010064/APP/7.6) explains that the design has been informed by the ten principles for good design as set out in the National Highways' design document 'The Road to Good Design'. The Scheme Design Report sets out in detail how each design principle has been met and how these align with the requirements of the NPS NN. The ten principles are:</p> <ul style="list-style-type: none"> • Makes roads safe and useful. • Is inclusive. • Makes roads understandable.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>landscape character, and is adaptable to future needs and technologies. The National Infrastructure Design Principles described good design as:</p> <ul style="list-style-type: none"> • a key aspect of sustainable development. It includes opportunities to enable decarbonisation, incorporates flexibility, and builds resilience against climate change. The functionality of projects, including fitness for purpose, resilience, and sustainability, is equally important. • helping to improve the quality of life for local communities. It promotes inclusion, cohesion and increases accessibility. It creates safe spaces with clean air that improve health and wellbeing. • giving places a strong sense of identity, creating a sense of place, connecting communities, addressing community severance, and integrating into its surroundings. It makes a positive contribution to the local landscape within and beyond the project boundary. Good design enhances local culture and character and supports local ecology, delivering through biodiversity net gain, while protecting wildlife corridors and irreplaceable nature assets and habitats. • adding value by defining issues clearly from the outset. Good design also finds 	<ul style="list-style-type: none"> • Fits in context. • Is restrained. • Is environmentally sustainable. • Is thorough. • Is innovative. • Is collaborative. • Is long-lasting. <p>The landscaping scheme as set out on Figure 2.3 Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) has taken the BMBC's Unitary Development Plan land use designations into account including the Special Landscape Area and the Green Belt and the Applicant has carefully designed groups of trees and shrubs to help integrate the Scheme into the surrounding vegetation pattern. The embankments gradients for the Northern Loop have been reduced to help the road integrate into the landscape setting. Also see the response to NPS NN paragraph 5.160.</p> <p>Measures which have been embedded within the design of the Scheme to reduce greenhouse gas (GHG) emissions and reduce the vulnerability of the Scheme to future changes in climate are described in Section 14.9 of Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1).</p> <p>The landscape design as shown on Figure 2.3 Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) has sought to go beyond just habitat creation required to compensate habitat loss and fragmentation by providing wider enhancement measures in the landscape. This has been achieved through planting of native trees and shrubs that link with existing woodland and wildlife corridors, to help provide greater connectivity in the landscape. For example, a linear belt of trees and shrubs, groups of trees and shrubs and hedgerows will be provided on the north side of the M60/M62 in Whitefield and in the vicinity of Pike Fold Golf Course to connect with existing woodland, ponds and grasslands.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>opportunities to add value beyond the main purpose of the infrastructure to consider the wider benefits savings on cost, the environment, materials, and space. It is efficient in the use of material resources, sustainable materials and energy used in construction.</p>	<p>Wherever possible, native hedgerows and tree lines have been incorporated along the highways boundary to create linear features that link areas of vegetation, improve biodiversity, strengthen the landscape pattern and help integrate the motorway infrastructure. Attenuation ponds will be planted with native marginal species, woodland and shrubs complimented by new shallow scrapes for wetland habitat creation.</p> <p>All grassland and wildflower seed mixes for areas that are deemed safety critical, such as sight lines, in front of signs and access areas, will be selected to allow proper establishment while maintaining safety critical requirements. Species would be selected following National Highways' 'Major Project Instruction: Low nutrient grassland - reducing maintenance and increasing biodiversity'. This policy, which was introduced in December 2020, specifies that new areas of grassland that are created as part of a major project, should no longer be covered in topsoil, leaving them as either bare substrate or bare subsoil and seeded with appropriate wildflower seeds for the geology of the site.</p> <p>This will address soft estate safety requirements whilst creating greater biodiversity. Seed mix selection would be cognisant of the short term to medium term challenges to successful establishment from climate change.</p> <p>The 'Net Zero Highways' (National Highways, 2021) sets out the Applicant's programme for achieving net zero GHG emissions for the SRN by 2050.</p> <p>Appendix O, the Outline Carbon Management Plan which is part of the First Iteration EMP (TR010064/APP/6.5) includes mitigation measures to reduce carbon in line with net zero targets for both construction and maintenance operations, such as:</p> <ul style="list-style-type: none"> • Preparation and implementation of a Logistics Management Plan (or similar) to manage the transport to/from and onsite of employees and materials required for the construction of the Scheme. The Logistics

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>Management Plan (or similar) will set out measures where practicable, to reduce distances travelled, optimise journeys and use low emission modes of transport (such as public transport) or vehicles (e.g. electric vehicles) to reduce GHG emissions associated with transport.</p> <ul style="list-style-type: none"> • Seeking to source materials from local suppliers, where practical and cost-effective to do so, in order to reduce the travel distance of materials and associated GHG emissions. • Measures to reduce the magnitude of GHG emissions associated with the use of materials and waste. Appendix G, Outline Materials Management Plan is provided in the First Iteration EMP (TR010064/APP/6.5). <p>To support this, the Principal Contractor for the Scheme will adopt the following processes during construction:</p> <ul style="list-style-type: none"> • Not using CEM1 cement or standardised concrete mixes (ST1-5) unless technical reasons justify their use (concrete products represent 17% of annual Scope 3 carbon emissions). • Using warm mix asphalt in place of hot mix asphalt unless technical reasons justify its use (asphalt products represent 30% of annual Scope 3 carbon emissions). • Ensuring all concrete, steel and aggregate suppliers provide carbon data for their products for comparison during procurement. • The Principal Contractor mandates the use of Hydrotreated Vegetable Oil (HVO) in place of diesel for construction plant wherever feasible, reducing related carbon emissions by up to 90%. <p>The Scheme design has provided solutions to overcome difficult design challenges, particularly as this part of the SRN is within a very dense urban setting which means there is limited land available to deliver the desired improvements. Therefore, innovative design approaches to overcome these</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>challenges have been required to ensure the improvements meet all the Scheme objectives. This includes:</p> <ul style="list-style-type: none"> • The Scheme has been designed to accommodate a five lane cross section and full hard shoulder (i.e. 70% or more of a link length) which has required optimal design and use of innovative retaining structures and earthwork arrangements, all without requiring additional permanent land from adjacent landowners. • The Scheme has optimised the drainage provision through use of over-sized pipes in order to reduce land take. • Designing gantries to minimise the land required for their supports.
4.25	<p>A good design should meet the principal objectives of the scheme by applying the mitigation hierarchy to avoid, eliminate or substantially mitigate the identified problems and existing adverse impacts, by improving operational conditions, simultaneously minimising adverse impacts and contributing to the conservation and enhancement of the natural, built and historic environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into economic, social, and environmental impacts.</p>	<p>The Scheme Design Report (TR010064/APP/7.6) sets out the design principles that have been applied to the Scheme. Also see the response to draft NPS NN paragraph 4.24.</p>
4.26	<p>In light of the above, scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied</p>	<p>The Scheme Design Report (TR010064/APP/7.6) sets out the design principles that have been applied to the Scheme. Also see the response to paragraph 4.24.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	that national networks infrastructure projects are sustainable, having regard to appropriate industry good design guidance, and the applicant has considered, as far as possible, both functionality (including fitness for purpose and sustainability) and aesthetics (including the scheme's contribution to the quality of the area in which it would be located).	
4.27	Applicants should have regard to the National Design Guidance, National Model Design Code, Local Nature Recovery Strategies, Local Air Quality Plans, the purposes of National Parks, Areas of Outstanding Natural Beauty, the Broads and any local design codes.	<p>The Scheme does not affect national landscape designations including Areas of Outstanding Natural Beauty and the Broads.</p> <p>The landscape proposals have taken the Bury Unitary Development Plan land use designations into account including the Special Landscape Area and the Green Belt and has carefully designed groups of trees and shrubs to help integrate into the surrounding vegetation pattern. The embankments gradients for the Northern Loop have been reduced to help the road integrate into the landscape setting.</p>
4.28	In their application, applicants should be able to demonstrate how the design process was conducted, effective engagement with communities and stakeholders and how the proposed design evolved to maximise design outcomes. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected with a clear articulation of the benefits. The Examining Authority and the Secretary of State should consider the ultimate purpose of the infrastructure and the operational,	<p>See the response to draft NPS NN paragraph 4.24 and draft NPS NN paragraph 4.29. The design has evolved through the following processes:</p> <ul style="list-style-type: none"> The Applicant has identified environmental constraints and opportunities at all stages of the design development and this has, for example, included collaborative working between the appointed design team and environmental specialists to minimise the impact of attenuation ponds through consideration of pond size, layout and location. The development of a mitigation and enhancement strategy that avoids unnecessary clearance of screening vegetation during the construction of the Scheme and specification of interplanting to reinforce existing and retained screening.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	safety and security requirements which the design must satisfy.	<ul style="list-style-type: none"> The Scheme design has also taken into account the outcomes of the options consultation in June 2020 to August 2020. Further details can be found in the Consultation Report (TR010064/APP/5.1). <p>The Applicant has consulted, as part of the statutory consultation held between March and April 2023, with affected land interests, prescribed consultees (such as Natural England), Local Planning Authorities, for example, Bury Metropolitan Borough Council, and specialist bodies (such as the Greater Manchester Archaeological Advisory Service) having regard to their responses as set out at Annex Q of the Consultation Report Annexes (TR010064/APP/5.2).</p>
4.29	Applicants should consider taking independent professional advice on the design aspects of a proposal. A project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Also, the Design Council can be asked to provide design review for NSIPs and applicants are encouraged to use this service.	<p>National Highways has created an independent Design Council of built environment experts to impartially evaluate Scheme design with a remit to constructively challenge design approach. This Design Council helps to provide Scheme specific observations and general recommendations that help put good design at the heart of network improvements.</p> <p>Through the role of the Design Council, a Design Panel of experts has reviewed the Scheme design. A Scheme briefing and site visit was carried out on 6 March 2023, with key attendees from the Design Panel and the Applicant in attendance. The Scheme briefing included a site walkover, panel discussion and presentation. The Design Panel prepared a confidential letter of advice for the Applicant. A summary of the advice received and how the Applicant considered this advice is provided in the Scheme Design Report (TR010064/APP/7.6).</p>
Climate change adaption		
4.32	Article 7 of the Paris Agreement establishes a global goal on adaption – of enhancing adaptive capacity, strengthening resilience, and reducing vulnerability to climate change in the context of temperature goal of the Agreement. It aims to significantly	As set out in Chapter 13, Road Drainage and the Environment and Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1) an extensive list of measures has also been embedded to reduce GHG emissions and increase the resilience of the Scheme to future changes in climate. In summary, key measures include:

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	strengthen national adaption efforts, including through support and international cooperation.	<ul style="list-style-type: none"> Minimising overall land take to reduce vegetation loss and planting new areas of woodland and vegetation in the Order Limits. Attenuation ponds will be designed to include a pool of water at the base of the pond (to create a wetland) that will retain the operational functionality of the attenuation ponds (so that vegetation is not lost during hot and dry periods and the treatment capacity of SuDS reduced). The Scheme is designed to be resilient to potential changes in the climate including drought, flood and temperature rises. Reducing the use of fossil fuel based machinery and plant during construction, for example electric powered machinery and plant.
4.33	To support planning decisions, the government produces a set of UK Climate Projections and has developed a National Adaption Programme. In addition, the government's Adaption Reporting Power invites authorities (a defined list of public bodies and statutory undertakers, including National Highways, Network Rail and the Office for Rail and Road) to assess the risks presented by a changing climate, include policies and actions to address climate risk and set out progress made.	The latest UK Climate Change Projections (UKCP18) have been used to understand possible changes in climate over the lifetime of the Scheme (up to the 2080s). The environmental impact assessment has therefore considered the effects of possible future changes in climate over a 60-year appraisal period. The potential impacts of these climatic changes on the Scheme are assessed in Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1) and mitigation measures identified. Based on the assessment undertaken it is considered that with the embedded and essential measures in place, the potential climate-related hazards and impacts identified during the operational phase are anticipated to be not significant.
4.34	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts. For example, as a result of protecting against flood risk, there may be consequential impacts on coastal change (see paragraphs 5.95 to 5.110). If this happens, the Secretary of State should	No additional impacts have been identified in the Environmental Statement (TR010064/APP/6.1).

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	consider the impact of the latter in relation to the application as a whole and the impact guidance set out in chapter 5 of this NPS.	
4.35	In preparing the measures to support climate change adaption applicants should consider whether nature-based solutions could provide a basis for such adaption. In addition to avoid further greenhouse gas emissions when compared with some more traditional adaption approaches, nature-based solutions can also result in biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere (see also paragraphs 5.170 to 5.194) on the role of green infrastructure).	The Scheme design has considered a variety of options for the mitigation of potential surface water drainage and flood risk impacts, including nature based solutions. Where practicable, sustainable drainage systems (SuDS), flow conveyance and attenuation features (e.g. attenuation ponds, swales, filter drains, etc.) have been used to reduce the impact of surface water runoff being discharged on the natural environment, thereby reducing flood risk and improving water quality. These measures, in particular SuDS, typically include areas of planting and therefore also have the potential to improve biodiversity and absorb small amounts of carbon dioxide (CO ₂) from the atmosphere. Further information is included in Chapter 13: Road Drainage and the Water Environment of the Environmental Statement (TR010064/APP/6.1) and Appendix 13.7: Drainage Strategy Report of the Environmental Statement Appendices (TR010064/APP/6.3).
4.36	New national networks infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. flooding of other parts of the road or rail network) impacts of climate change when planning the location, design, build, operation and maintenance. The Secretary of State will need information on how the proposal will take account of projected impacts of climate change and remain resilient.	<p>The UKCP18 projections are the latest available and have been used to understand possible changes in climate over the lifetime of the Scheme (i.e. up to the 2080s). The potential impacts of these climatic changes on the Scheme have been assessed in Section 14.10 of Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1).</p> <p>The Independent Assessment of UK Climate Risk (Climate Change Committee, 2021), which provides advice to the Government to inform the UK's third Climate Change Risk Assessment (CCRA3), has also been reviewed as part of this assessment (see Section 14.7 of Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1)).</p> <p>As noted in Chapter 13: Road Drainage and the Water Environment of the Environmental Statement (TR010064/APP/6.1), climate change uplifts based on</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>the latest published Environment Agency guidance (May 2022) have informed the design of the Scheme.</p> <p>Based on the above, mitigation measures embedded within the design of the Scheme have been identified and presented within Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1)), along with essential mitigation measures, which are presented within REAC, which is contained within the First Iteration EMP (TR010064/APP/6.5). An example of such mitigation is the use of equipment resistant to high temperatures such as lighting which is designed to withstand temperatures equivalent to those experienced in the United Arab Emirates.</p>
4.37	<p>The Secretary of State should be satisfied that applications for new national networks infrastructure have taken into account the potential direct and indirect impacts of climate change. This should include using the latest UK Climate Projections and associated research and expert guidance (such as the Environment Agency’s Climate Change Allowances for Flood Risk Assessments) applicable at the time the environmental assessment was prepared as part of the Development Consent Order application, to ensure they have identified mitigation and adaption measures. This should cover the estimated lifetime of the new infrastructure, with a high level of climate resilience built-in from the outset. The applicant should also be able to demonstrate how the proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum</p>	<p>In accordance with paragraph 3.28 of National Highways’ Design Manual for Roads and Bridges (DMRB) LA 114, the latest available projections (i.e. UK Climate Projections 2018 (UKCP18)) have been used for the high emissions (i.e. Receptor Concentration Pathway (RCP) 8.5) scenario against the 2080 projections at the 50% probability level.</p> <p>UKCP18 supersede UKCP09 and is considered to provide a better estimate of future climate conditions.</p> <p>The latest UK Climate Change Projections (UKCP18) have been used to understand possible changes in climate over the lifetime of the Scheme (up to the 2080s). The EIA process has therefore considered the effects of possible future changes in climate over a 60-year appraisal period. The potential impacts of these climatic changes on the Scheme is assessed in Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1).</p> <p>The drainage design has been developed taking into account future potential increases in flooding. The Environment Agency’s guidance on climate change allowances has been used (Environment Agency, 2022). This is set out in Appendix 13.7, Drainage Strategy Report of the ES Appendices</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>climate change scenario. Should a revised set of UK Climate Projections or associated research be applicable after the preparation of environmental assessment, the Examining Authority should consider whether they need to request further information from the applicant.</p>	<p>(TR010064/APP/6.3) and reflected in Appendix 13.6, Flood Risk Assessment Report of the Environmental Statement Appendices (TR010064/APP/6.3).</p>
<p>4.38</p>	<p>The Secretary of State should be satisfied that there are no features of the design of new national networks infrastructure critical to its safety or operation which may be seriously affected by more radical changes to the climate. Beyond that projected in the latest set of UK climate projections and taking account of the latest credible scientific evidence on, for example, sea level rise. The Secretary of State should also be satisfied that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.</p>	<p>Climate assessments have previously used the H++ climate scenarios to test the sensitivity of vulnerable safety-critical features, to ensure that such features would not be affected by more radical changes to the climate beyond that projected in the latest set of UK Climate Projections. The H++ scenarios cover heat waves, cold snaps, low and high rainfall, droughts, floods and windstorms. However, of these climate related events, the greatest risks to safety critical features (e.g. structures) are considered likely to be those associated with flooding.</p> <p>The H++ scenarios were developed using a set of climate change projections which have since been superseded (i.e.UKCP09); however, the Met Office does not propose to update these scenarios using UKCP18.</p> <p>Following the publication of updated guidance on climate change allowances (which can be found at https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances), the H++ scenarios are no longer used to inform peak river flow allowances on highway schemes. Instead, peak river flow allowances are based on percentiles which describe the proportion of potential scenarios that fall below an allowable level. These allowances are determined by Environment Agency management catchments which are sub-catchments of river basin districts. As discussed in Chapter 13: Road Drainage and the Water Environment of the Environmental Statement (TR010064/APP/6.1), consideration has been given to potential changes to the risk of flooding should more radical changes in climate occur.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>It is, however, considered unlikely that such future changes in rainfall intensity will substantially increase the risk of flooding to the Scheme. As the Scheme is located in Flood Zone 1 (at less than 0.1% chance of flooding in any year), hydraulic modelling has not been undertaken, nor an assessment of a H++ scenario.</p>
4.39	<p>Any adaption measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the Environment Agency's Climate Change Allowances for Flood Risk Assessments. Any adaption measures must themselves be assessed as part of any environmental assessment, which should set out how and where such measures are proposed to be secured.</p>	<p>In accordance with paragraph 3.28 of National Highways' Design Manual for Roads and Bridges LA 114, the latest available projections (i.e. UK Climate Projections 2018 (UKCP18)) have been used for the high emissions (i.e. Receptor Concentration Pathway (RCP) 8.5) scenario against the 2080 projections at the 50% probability level. UKCP18 supersede UKCP09 and is considered to provide a better estimate of future climate conditions.</p> <p>Based on these possible changes in climate, mitigation measures embedded within the design of the Scheme have been identified and presented within Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1)), along with essential mitigation measures, which are presented within the REAC, which is contained within the First Iteration EMP (TR010064/APP/6.5).</p> <p>With regards to flood risk, Government guidance on climate change consideration for fluvial and surface water flows has been followed (Environment Agency, 2022). The details of the methodology and assessment are included in Appendix 13.6: Flood Risk Assessment Report of the Environmental Statement Appendices (TR010064/APP/6.3). As stated in Chapter 13, Road Drainage and the Water Environment of the Environmental Statement (TR010064/APP/6.1), no adaptation measures have been identified.</p> <p>Examples of measures to help adapt to climate change that have been incorporated and are included in the Environmental Statement (TR010064/APP/6.1) include:</p> <ul style="list-style-type: none"> The highway drainage system is designed with allowances for climate change in line with the latest national Environment Agency Climate Change Guidance (https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances). This is set out in Appendix

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>13.7, Drainage Strategy Report of the Environmental Statement Appendices (TR010064/APP/6.3).</p> <ul style="list-style-type: none"> • Positive drainage measures (measures which encourage water to drain away from an area rather than pooling) would be installed behind all retaining walls with accessible maintenance rodding points. Weepholes would also be provided as an additional drainage measure. • The detailed landscape design and plant species selection will be developed following best practice to address the effects of climate change. This will include diversifying planting species as much as practicable, including using drought tolerant species, whilst still having regard to the local character, and generally planting only native species, and using species more resilient to pests and diseases. The plant species mix, developed with Arboriculturists and Ecologists, is provided in Appendix N, Outline Landscape and Ecology Management Plan , of the First Iteration EMP (TR010064/APP/6.5). Plant species will be reviewed during detailed design and included in the Second Iteration of the EMP. • In terms of increased future flood risk, the landscape design will futureproof the Scheme by including species tolerant of flooding, such as willow and alder, on floodplains and next to watercourses. • The use of equipment resistant to high temperatures such as lighting which is designed to withstand temperatures equivalent to those experienced in the United Arab Emirates.
4.40	Adaption measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or	All the measures incorporated into the Scheme to mitigate against climate change are incorporated into the design and will be constructed as an integral part of the design.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>surrounding environment (for example, coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaption measure could be implemented should the need arise, rather than at the outset of the development (for example, reserving land for future extension or increasing the height of existing, or requiring new, sea walls). In these circumstances, the applicant should make a case to justify implementing adaption measures later, set out clearly how the design could be adapted and have mechanism in place (such as Development Consent Order requirements) for monitoring and implementing of these future adaption measures.</p>	
4.41	<p>The generic impacts advice in this NPS provides additional information on climate change adaption. In particular this section should be read alongside paragraphs 5.95 to 5.110 (coastal change and marine impacts), paragraphs 5.120 to 5.145 (flood risk) and paragraphs 5.243 to 5.259 (water quality and resources).</p>	Noted, no specific response required.
Pollution control and other environmental regulatory regimes		
4.43	<p>Issues relating to discharges or emissions from a proposed project which lead to direct or indirect impacts on air quality, water quality and land quality, or which include</p>	<p>Operational emissions from road schemes do not fall within environmental regulatory regimes and therefore the Scheme does not require permitting.</p> <p>At this point (submission of the application for development consent) the majority of consents and all powers required have been included, or addressed, in the</p>

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	<p>noise, light and vibration, may be subject to separate regulation, under the pollution control framework or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated.</p>	<p>draft Development Consent Order (TR010064/APP/3.1) as permitted by various provisions of the 2008 Act. However, not all consents/permits/licenses required to deliver the Scheme are included and the following will be sought out with the draft Development Consent Order. The Consents and Agreements Position Statement (TR010064/APP/3.3) details the various consents that could be required as part of the construction of the Scheme:</p> <ul style="list-style-type: none"> • Agreement to use herbicide in or near water • Waste exemptions (e.g. U1, T5) • Part B / mobile plant permit (Crushing or screening) • Environmental Permit for waste operations • CL:aire Materials Management Plan • Licence to work with Asbestos • Section 61 • Great Crested Newt Licence • Bat Licence • Badger Licence • S106 Foul sewer connection • Trade effluent consent • Environmental Permit Flood Risk Activity (FRAP) • Ordinary Watercourse Consent (temporary or permanent) • Water Abstraction (Temporary / Permanent) • Water Abstraction – Passive dewatering • Water Transfer (during construction or operation)

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		<ul style="list-style-type: none"> Environmental Permit for water discharge
4.44	<p>Pollution from industrial sources in England and Wales are controlled through the Environmental Permitting (England and Wales) Regulations 2016 (the Environmental Permitting Regulations). Some projects covered by this NPS may be subject to the Environmental Permitting Regulations regime, which also incorporates operational waste management requirements for certain activities. When an applicant applies for an Environmental Permit, the relevant regulator (usually the Environment Agency but sometimes the local authority) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permit requirements.</p>	<p>As set out in the response to draft NPS NN paragraph 5.69, the Scheme does not require an Environmental Permit under this legislation. As set out at draft NPS NN paragraph 4.43 other consents/permits/licenses may be required later if the Development Consent Order is made.</p> <p>Where an environmental permit is identified as being required, engagement with the relevant regulator will be undertaken to ensure that any application meets the Environmental Permit requirements.</p> <p>The Consents and Agreements Position Statement (TR010064/APP/3.3) sets out the Applicants intended strategy for obtaining the consents and associated agreements needed to implement the Scheme if the Development Consent Order is made.</p>
4.46	<p>Applicants are encouraged to begin pre-application discussions with relevant regulators, such as the Environment Agency and the Marine Management Organisation, as early as possible. Where applicants wish to parallel track Development Consent Order and Environmental Permits applications, applicants should start work towards submitting the permit application at least six months prior to the submission of an application for a Development Consent Order. This will help ensure the applications</p>	<p>Consultation and engagement with the Environment Agency have taken place during development of the Scheme. This has included engagement on technical matters such as flood risk, drainage and groundwater. See the response to draft NPS NN paragraph 4.43 and draft NPS NN paragraph 4.44 above.</p> <p>A Statement of Common Ground is being developed with the Environment Agency to record the matters agreed between both parties and identify any matters which still need to be agreed. The Statement of Common Ground will be submitted to the Examining Authority during the course of the examination of the application for development consent.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	take account of the relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority.	
4.47	Applicants must consult the Marine Management Organisation on national networks NSIPs which could affect any relevant marine areas as defined in the Planning Act 2008 (as amended by section 23 of the Marine and Coastal Access Act 2009). Applicants are encouraged to consider the relevant marine plans in advance of consulting the Marine Management Organisation. The Secretary of State's consent may include a deemed marine licence and the MMO will advise on what conditions should apply to the deemed marine licence. The Secretary of State, the Examining Authority and the Marine Management Organisation should co-operate closely to ensure that national networks NSIPs are licensed in accordance with legislation.	The Scheme does not impact on any marine areas.
4.48	In considering an application for development consent, the Examining Authority and the Secretary of State should consider whether the development itself is an acceptable use of land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State will	This table sets out an assessment of the Scheme against the requirements of the draft NPS NN, including signposting to assessments contained within the relevant DCO application documents. This is to assist the examining authority determine if the Scheme is an acceptable use of land against the relevant National Policy Statement, as required by s104 of the 2008 Act.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>assume that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.</p>	
4.49	<p>The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. Working in close cooperation with the Environment Agency and / or the pollution control authority, and other relevant bodies, such as the Marine Management Organisation, the Statutory Nature Conservation Bodies, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied early in the process and through parallel tracking of the Development Consent Order and Environmental Permits, before consenting any potentially polluting developments, that:</p> <ul style="list-style-type: none"> • the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework. • the effects of existing sources of pollution in and around the site are not such that the cumulative effect of the 	<p>The potential environmental effects of the Scheme are considered throughout the Environmental Statement (TR010064/APP/6.1).</p> <p>The First Iteration EMP (TR010064/APP/6.5) contains the REAC, which sets out the mitigation measures that will be provided to offset and manage the construction impacts of the Scheme.</p> <p>The First Iteration EMP (TR010064/APP/6.5) will be developed into the Second Iteration EMP to be implemented during construction and is secured by Requirement 4 of the draft DCO (TR010064/APP/3.1).</p> <p>The Third Iteration EMP will be developed on completion of the Scheme and set out those ongoing measures required for operation and maintenance. This is secured by Requirement 4 of the draft DCO (TR010064/APP/3.1).</p> <p>The First Iteration EMP (TR010064/APP/6.5) includes a number of outline management plans to control and limit the potential for pollution included as appendices:</p> <ul style="list-style-type: none"> • Outline Air Quality and Dust Management Plan. • Outline Noise and Vibration Management Plan. • Outline Site Waste Management Plan. • Outline General Ecology Management Plan. • Outline Invasive Species Management Plan. • Outline Soil Management Plan. • Outline Materials Management Plan.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>pollution when the proposed development is added would make the development unacceptable, particularly in relation to statutory environmental quality limits.</p>	<ul style="list-style-type: none"> • Outline Surface and Ground Water Management Plan. • Outline Construction Compound Management Plan. • Outline Contaminated Land Management Plan. • Outline Energy & Resource use Management Plan. • Outline Emergency Procedures & Environmental Incidents. • Environmental Constraints Map. • Outline Landscape and Ecology Management Plan. • Outline Carbon Management Plan. <p>The Consents and Agreements Position Statement (TR010064/APP/3.3) sets out the Applicant's intended strategy for obtaining the consents and associated agreements needed to implement the Scheme if the DCO is granted. See the response to draft NPS NN paragraph 4.43.</p>
4.50	<p>The Secretary of State should not refuse consent because of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences, or other consents would not be granted.</p>	<p>See the response to paragraph draft NPS NN paragraph 4.49. The Applicant does not anticipate that any additional consents outside the development consent process would be refused on these grounds.</p>
<p>Common law nuisance and statutory nuisance</p>		
4.53	<p>It is very important that, during the examination of a nationally significant infrastructure project, possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990, and how they might be mitigated or limited, are considered by the Examining Authority so that they can recommend appropriate requirements that the Secretary of State might include in any subsequent order</p>	<p>The draft Development Consent Order (TR010064/APP/3.1) and the Explanatory Memorandum (TR010064/APP/3.2) discusses statutory nuisance claims and provides a defence to those nuisances which may be of relevance to the Scheme. These are further detailed in the Statement relating to Statutory Nuisances (TR010064/APP/6.8) provided as part of the application for development consent.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	granting development consent. More information on the consideration of possible sources of nuisance is at paragraphs 5.111 to 5.119.	
Safety		
<i>Road Safety</i>		
4.55	Highways developments provide an opportunity to make significant safety improvements and significant incident reduction benefits when they are well designed. Some developments may have safety as a key objective, but even where safety is not the main aim of a development, the opportunity should be taken to improve safety, including introducing the most modern and effective safety measures where proportionate. Consideration should	See the responses to draft NPS NN paragraphs 4.56-4.59 below which covers all these points. The Scheme is to upgrade an existing part of the SRN Therefore, rest areas do not need to be considered as part of the Scheme.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>also be given to wider transport objectives, including expanding active travel, creating safe and attractive walking, wheeling and cycling environments, enabling modal shift to sustainable transport options including public transport and decarbonisation. In developing road schemes the applicant should have due regard to the needs of drivers and the imperative to ensure driver safety. Schemes should be developed with a mindset that accounts for need for drivers to rest, particularly Heavy Goods Vehicle drivers who need safe and secure roadside facilities that also cater for their welfare needs including the appropriate provision of high-quality washrooms, a catering offer and access to alternative fuel and digital infrastructure.</p>	
4.56	<p>The applicant should undertake an objective assessment of the impact of the proposed development on safety including the impact of mitigation measures. This should use the methodology outlined in the guidance from the Department for Transport’s Transport Appraisal Guidance and from National Highways. They should also put in place arrangements for undertaking the road safety audit process and ensuring their implementation. Road safety audits are a mandatory requirement for highway improvement schemes in the UK (including motorways). Road safety audits are intended</p>	<p>The Transport Assessment (TR010064/APP/7.4) and the Case for the Scheme (TR010064/APP/7.1) provides an assessment of the overall impact of the Scheme on road safety in accordance with WebTAG and National Highways guidance.</p> <p>The requirements resulting from the road safety audit undertaken at preliminary design have been incorporated into the Scheme design where appropriate.</p> <p>Accident impacts resulting from the Scheme were assessed using the Department for Transport Cost and Benefit to Accidents – Light Touch (COBALT) program (version 2.4 which is the latest version available at the time of this study). This is the software that calculates the impact of accidents as part of the economic appraisal of a road scheme in line with Transport Appraisal Guidance.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	to ensure that operational road safety experience is applied during the design and construction process so that the number and severity of collisions is as low as reasonably practicable.	COBALT assesses the safety impacts of road schemes on the road links and junctions that will be affected by the Scheme. Model inputs include accident rates and forecast traffic volumes for the with and without scheme scenarios from the SATURN traffic model.
4.57	<p>The applicant should be able to demonstrate that their scheme is consistent with the national Strategic Framework for Road Safety and with the National Highways Safety Framework for the Strategic Road Network. Applicants will wish to show that they have taken steps that are reasonably required to:</p> <ul style="list-style-type: none"> • minimise the risk of death and injury arising from their development. • contribute to the overall reduction in road casualties. • contribute to the overall reduction in the number of unplanned incidents. • contribute to improvements in road safety for walkers and cyclists. 	<p>STATS 19 (road safety data issued by DfT) Personal Injury Accident (PIA) data for the latest available complete pre-Covid five-year period 2015-2019 was used to identify the level of existing accidents in the study area. Between 2015 and 2019 there were a total of 829 casualties, of which 83% were slight, 15% serious and 1% were fatal casualties. The number of casualties per year are relatively consistent, on average 165 casualties occurred per year.</p> <p>An assessment of accident impacts has been completed using CCOBALT, the assessment forecasted a reduction in accidents as a result of the Scheme. are calculated as the difference between the number of accidents in the without the Scheme (Do Minimum) and with Scheme (Do Something) scenarios. Over the 60-year appraisal period, the Scheme is forecast to lead to a reduction in 9 accidents over the 60-year appraisal period. Further details are available in the Transport Assessment (TR010064/APP/7.4).</p> <p>Table 6-4 of the Transport Assessment (TR010064/APP/7.4) indicates that the SRN is forecast to experience an increase in accidents as more people are attracted to using the SRN as a result of better journey reliability once the Scheme is operational, as much of the additional SRN traffic reroutes from the local road network. As a result of the Scheme, 61 fewer PIAs are forecast on the local roads that are included in the COBALT assessment. Table 6-3 of the Transport Assessment (TR010064/APP/7.4) indicates that while there is a slight decrease in the overall volume of accidents, the number of fatal, serious and slight casualties increases slightly equivalent to 1.0, 1.2 and 12.7 additional fatal, serious and slight casualties over the 60-year appraisal period.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>However, M60 Junction 18 is forecast to experience 35 fewer PIAs over 60 years due to the Scheme removing traffic from Junction 18 onto the Northern Loop. Conversely the increased traffic flows using M60 Junction 17 taking advantage of the Scheme results in 14 additional PIAs forecast on this junction.</p> <p>As more people will use the Scheme this means overall there will be more users and more miles will be driven. The casualties per billion vehicle kilometres have been calculated across the assessment area, this shows that the risk of accident and the risk of a PIA is reduced for each driver due to the Scheme. Further details can be found in paragraph 6.4.8 of the Transport Assessment (TR010064/APP/7.4).</p> <p>The Scheme is to improve the existing motorway network. Any crossing points are already either underneath or above the motorway. As such an assessment of accidents for walkers and cyclists has not been undertaken as this group of users are prohibited from the motorway network.</p>
4.58	<p>They will also wish to demonstrate that:</p> <ul style="list-style-type: none"> • they have considered the safety implications of their projects from the outset. • They are putting in place rigorous processes for monitoring and evaluating safety. 	<p>See response to draft NPSNN paragraph 4.57 above.</p> <p>The Applicant has considered safety through the consideration of alternatives and the design evolution of the Scheme. Once the Scheme is operational a road safety audit will be undertaken to assess the safety and operational aspects of the Scheme. This will identify if there are any further opportunities to enhance safety once the Scheme is operational.</p>
4.59	<p>The Secretary of State should not grant development consent unless satisfied all reasonable steps have been taken and will be taken to:</p> <ul style="list-style-type: none"> • minimise the risk of road casualties arising from the scheme. 	<p>The Scheme has been designed to appropriate design standards and is fully compliant with all aspects of National Highways safety governance procedures. The evaluation of risk needs to document, in accordance with GG 104 of National Highways' DMRB, that the design meets the test of being safe, meaning risk has been reduced to a level 'As Low As Reasonably Practicable' (ALARP). This is complex as a test, since there is also a budgetary requirement on schemes , and the test needs to demonstrate compliance with a large set of</p>

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	<ul style="list-style-type: none"> contribute to improvements in the safety of the SRN. 	<p>sometimes-competing metrics. Part of the test of determining ALARP is about attempting to quantify risk, as described above. Another aspect is recording the evaluation of scope for mitigation, since this can potentially support meeting both budgetary and ALARP tests for a scheme.</p> <p>A variable speed limit is proposed when circumstances merit it, such as during periods of congestion, poor weather conditions or other hazards such as a broken down vehicle or obstacles in the carriageway. The Scheme design includes numerous safety measures which include the provision of a hard shoulder, emergency phones and CCTV to ensure that emergencies are dealt with as quickly and as safely as possible.</p> <p>Nine new overhead gantries would be provided in total. The locations of new major structures and gantries are shown on Figure 2.2: Scheme Design of the Environmental Statement Figures (TR010064/APP/6.2). Three gantries will be provided on the M60 eastbound, two on the M60 westbound and four on the M66. Two gantries (one for each direction on the M60) will span the entire motorway whereas the others would be specific to each side of the carriageway. The gantries will provide both fixed signage to direct motorists as well as presenting dynamic information such as a reduced speed limit, the closure of a lane or other service updates such as warning of closures elsewhere on the SRN network. The presentation of this information is designed to ensure that customers navigate this busy section of the SRN network as safely and as quickly as possible as well as to help manage driver stress by presenting up to date information on any impediments to people’s journeys.</p> <p>As set out in Chapter 2, The Scheme of the Environmental Statement (TR010064/APP/6.1), the Scheme will also upgrade existing intelligent transportation systems or install new systems where required. This includes VMS mounted on cantilever and long span cantilever gantries, AMI above lane signals, HADECS and “EAV, CCTV, and MIDAS.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>The gantries will therefore provide both fixed signage to direct motorists as well as incorporating advanced technology to present dynamic information. This enables the SRN to be controlled and for rapid and dynamic response such as reducing the speed limit, the closure of a lane or other service updates such as warning of closures elsewhere on the SRN. The presentation of this information is designed to ensure that customers navigate this busy section of the SRN as safely and as quickly as possible as well as to help manage driver stress by presenting up to date information on any impediments to people’s journeys. It also assists the emergency services respond to any incidents quickly.</p> <p>The area covered by the Scheme already has a notably lower Fatal Weighted Injury rate per billion vehicle miles than the SRN motorway average, however it has an overall collision rate higher than the SRN motorway average. The reduction in congestion will reduce the number of overall collisions to contribute to an overall improvement in the safety of the SRN, however those collision that may occur will be at higher speeds and the severity may therefore be increased.</p> <p>The Scheme is required to provide congestion relief rather than safety improvements and the area covered by the Scheme already has a notably lower Fatal Weighted Injury rate per billion vehicle miles than the SRN motorway average, however it has an overall collision rate higher than the SRN motorway average. The reduction in congestion will reduce the number of overall collisions to contribute to an overall improvement in the safety of the SRN, however those collision that may occur will be at higher speeds and the severity may therefore be increased.</p> <p>The Scheme would reduce collisions at Junction 18 when compared to the existing situation, but conversely more collisions would occur at Junction 17. The overall safety of the SRN is improved by the Scheme when considered proportionally against the total number of miles driven over the 60 year appraisal period.</p> <p>Overall, it is considered that all reasonable steps have been taken to minimise the risk of road casualties and to improve the overall safety of the SRN.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
Security considerations		
4.66	Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage of in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially critical infrastructure, there may be national security considerations.	No national security implications have been identified in developing the Scheme.
4.68	The applicant should only include sufficient information in the application as is necessary to enable the Examining Authority and the Secretary of State to examine the development consent issues and make a properly informed recommendation on the application.	The Applicant has not provided any information that may compromise national security.
Health		
4.71	As described in the relevant sections of the NPS, where the proposed project has an effect on human beings, the applicant should assess these effects, identifying any potential adverse health impacts, and identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. Enhancement opportunities should be identified by promoting local improvements for active travel and horse riders driven by the principles of good design	Opportunities to limit adverse impacts on health and provide benefits have been identified within Chapter 12: Population and Human Health of the Environmental Statement (TR010064/APP/6.1). Chapter 12 Population and Human Health of the Environmental Statement provides an assessment of effects on human beings as a result of the Scheme, including the identification of potential adverse health impacts and sets out mitigation measures. The assessment identifies vulnerable groups where relevant. Any impacts will be temporary and there is an overall health benefit in terms of reduction to traffic noise as quantified in Tables 12.36 and 12.37 in Chapter 12, Population and Human Health. The cumulative impact on health is captured in Table 12.38 of Chapter 12 Population and Human Health, which considers how the combination of impacts on

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	to create safe and attractive routes to encourage health and wellbeing; this includes potential impacts on vulnerable groups within society i.e. those groups within society which may be differently impacted by a development compared with the wider society as a whole.	determinants such as access to green space, walking and cycling, noise, air pollution and lighting and interaction of construction impacts may combine and affect some communities to a greater or lesser extent than others. The results show that communities in Besses ward will be subject to a combination of adverse health effects from impacts on health determinants during construction. This indicates a greater impact on quality of life for this community during construction. During operation, Besses ward will not be disproportionately affected.
Accessibility		
4.73	The government’s strategy for achieving equal access for disabled people is set out in the Inclusive Transport Strategy. The government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering schemes that take account of the accessibility requirements of all those who use, or affected by, national networks infrastructure, including disabled users.	<p>The design has been developed in accordance with the Equalities Act 2010 which includes equal access for disabled people. The Equality Impact Assessment (TR010064/APP/7.7) discusses how the requirements of the Equalities Act 2010 have been embedded in the Schemes development, including design, communication and engagement strategy and mitigation strategies.</p> <p>Overall, the Scheme incorporates a dedicated hard shoulder for emergency vehicles and to provide refuge in the case of emergencies and breakdowns, except where physical obstructions have prevented this. The use of technology also alerts National Highways patrol teams where immediate assistance to motorway users is required.</p> <p>The Scheme does not provide any additional severance that may impact disabled people.</p>
4.74 – 4.75	Applicants must comply with any obligations under the Equality Act 2010. Public Authority applicants are reminded of their duty to promote equality and to consider the needs of disabled people as part of their normal practice. The Public Sector Equality Duty	See the response to draft NPS NN paragraph 4.73.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>requires that public authorities have due regard to the need to:</p> <ul style="list-style-type: none"> • eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act. • advance equality of opportunity between people who share a protected characteristic and people who do not share it. • foster good relations between people who share a protected characteristic and people who do not share it. <p>All applicants are also reminded that the Secretary of State must have regard to the Public Sector Equality Duty when exercising their functions.</p>	
4.76	<p>As set out in paragraphs 4.5 to 4.6, applicants for road and rail projects (excluding SRFIs) will normally be supported by a business case prepared in accordance with the Transport Business Case guidance. This includes distributional analysis, including assessments stemming from the Equality Act public sector equality duty, where appropriate.</p>	<p>See the response to draft NPS NN paragraph 4.5 and draft NPS NN paragraph 4.73.</p>
4.77	<p>Applicants should demonstrate the following where relevant:</p> <ul style="list-style-type: none"> • all reasonable opportunities to deliver improvements in accessibility on and to the existing national road network, 	<p>The Scheme will not cause any new severance. The magnitude of health impacts related to community severance is assessed as negligible negative. No physical obstruction to access employment, services, facilities and leisure is anticipated during construction.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>should be taken, including improvements for non-motorised users.</p> <ul style="list-style-type: none"> • severance can be a problem in some locations, where appropriate, applicants should seek to deliver improvements that reduce community severance and improve accessibility. • National Network infrastructure should incorporate good design, as expanded on in paragraphs 4.24 to 4.29 which includes improving accessibility of infrastructure for users and inclusive design. 	<p>There is potential for traffic management and diversions to impact on the reliability of journey times during the construction period. This includes night closures of the motorway when diversion routes will be in place. However, these impacts will not reduce overall connectivity to employment, services, facilities and leisure. No change to tram and train networks is anticipated. The magnitude of impact during construction will be minor reflecting that changes to connections would be occasional events and affect a small population. There will be a rapid reversal of impacts on completion of construction health severity will relate to a moderate change in quality of life for those affected.</p> <p>The key objectives of Scheme includes to reduce peak congestion. delivering journey time reliability and improving safety on this motorway section of the SRN There are already several formal crossing points of the M60 and M66 within the Order Limits (Sandgate Road, Castle Road, Hills Lane, and Simister Lane) as well as Old Hall Lane Footbridge just south of the Order Limits. Therefore, further pedestrian, cyclist and equestrian crossing infrastructure is not provided.</p> <p>The Scheme includes a modest enhancement for recreational walkers through the inclusion of a new route through an area of ecological mitigation. It would not cause any severance of existing routes for WCH There would be some temporary effects on Public Rights of Way (PRoW) experienced during construction, although appropriate diversion routes would be provided.</p> <p>The Scheme includes re-provisioning for any side roads or PROW that will be permanently affected by the footprint of the Scheme, as set out in the Streets, Rights of Way and Access Plans (TR010064/APP/2.5).</p>

Chapter 5 – Generic Impacts

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
Air quality and emissions		
5.11 – 5.12	<p>Where a project is likely to have adverse effects on air quality and / or where a project could lead to a deterioration in air quality in an area or lead to a new area where air quality breaches any national air quality limits or statutory air quality objectives, the applicant should undertake an assessment as part of their Development Consent Order application.</p> <p>The assessment should describe:</p> <ul style="list-style-type: none"> • any air pollutant emissions, that would lead to a deterioration in air quality and their mitigation, distinguishing between the project stages, including any construction and operation, and taking account of emissions such as from any road traffic generated by the project. • the predicted absolute emissions levels of the proposed project after mitigation methods have been applied. • existing air quality levels, how they are monitored and the relative change in air quality from existing levels. • any potential impacts on nearby protected habitats from air pollutant emissions. 	<p>The impact of the Scheme has been assessed against both the relevant Air Quality Objectives and Limit Values, as discussed in section 5.3 of Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1).</p> <p>Existing monitoring and baseline conditions, emissions for the affected road network (ARN) and modelled air quality impacts within 200m of affected roads for both human and protected habitats are presented in Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1) and in Appendix 5.2: Air Quality Results of the Environmental Statement Appendices (TR010064/APP/6.3). Affected roads are those where the traffic level changes are likely to result in a change in road traffic related air pollution concentration, locations beyond the affected roads are unlikely to result in a significant impact, The definition of the ARN is further explained in Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1).</p>

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5.13	<p>Defra publishes future projections of UK air pollutant emissions based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. The applicant's assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts. If the latest future projections do not reflect the latest available evidence base at the assessment stage, applicants should still provide an assessment using the latest future projections published by Defra. If an applicant believes they have robust additional supporting evidence that is likely to change the projected emissions, they should include this in their representation to the Examining Authority.</p>	<p>Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1) discusses the methodology including use of national air quality projection data, road traffic data and projected road traffic emissions factors, and detailed modelling. The chapter concludes with an assessment of the significant effects for air quality.</p>
<i>Mitigation</i>		
5.14	<p>Mitigation measures may affect the project design, layout, construction, operation and / or may consist of measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme. Measures could include, but are not limited to, changes to the route of the new scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to trap or better disperse emissions, and / or speed control. Applicant should</p>	<p>The Scheme design has evolved over time as discussed in Chapter 3: Assessment of Alternatives in the Environmental Statement (TR010064/APP/6.1).</p> <p>The air quality assessment is provided in Chapter 5: Air Quality of the Environmental Statement (TR010064/APP/6.1). This outlines that there are no adverse impacts of the Scheme during operation on air quality which will warrant a change to the design or additional mitigation measures. Construction impacts are considered in draft NPS NN paragraph 5.15 below.</p>

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	<p>routinely look for opportunities within the design of the proposed development to embed nature-based solutions, such as urban woodlands and trees to assist with pollutant reduction and dispersal along major transport corridors. In addition to avoiding further greenhouse gas emissions when compared with some more traditional approaches, nature-based solutions can also result in biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere (see also paragraphs 5.171 to 5.195 on the role of green infrastructure).</p>	<p>See the response to draft NPS NN paragraph 4.35 which covers nature based measures that are incorporated into the Scheme design.</p>
5.15	<p>The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. In doing so the Secretary of State should have regard to the Air Quality Strategy or any successor to it and should consider relevant advice with Local Air Quality Management guidance.</p>	<p>The appointed environment team has worked in close collaboration with the infrastructure design team to avoid or reduce environmental impacts through the Scheme design. This is referred to as embedded (or design) mitigation.</p> <p>Chapter 3: Assessment of Alternatives of the Environmental Statement (TR010064/APP/6.1) details the design alternatives that have been considered, including the environmental factors which have influenced the decision-making.</p> <p>No significant effects are identified for air quality as discussed in section 5.10 of Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1), therefore, other than for construction dust (discussed below) no mitigation plan is necessary.</p> <p>An Outline Air Quality and Dust Management Plan has been produced and can be found at Appendix A of the First Iteration EMP (TR010064/APP/6.5), which covers dust mitigation. The Outline Air Quality and Dust Management Plan contains measures to control fugitive dust to avoid and reduce potential impacts during construction. Mitigation measures include the dampening down of surfaces, planning the site layout so that machinery and dust-causing activities occur as far from receptors as possible, erecting screens or barriers around the</p>

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		dust-causing activities or the site boundary, covering stockpiles to prevent entrainment by wind and undertaking regular monitoring. The Outline Air Quality and Dust Management Plan will be developed into the Air Quality and Dust Management Plan as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).
5.16	The proposed mitigation measures should ensure that the net impact of the project does not delay the point at which a zone will meet compliance timescales.	No significant effects are identified for air quality as discussed in section 5.10 of Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1), including in the context of Air Quality Directive Limit Values and the associated deterioration in air quality in a zone/agglomeration.
<i>Decision making</i>		
5.20	Where a project is likely to lead to a breach of such limits or objectives, the applicant should work with the relevant authorities to secure appropriate mitigation measures to avoid any breach and allow the proposal to proceed. Where a project is located within, or in close proximity to, a Local Air Quality Management Area or Clean Air Zone, applicants should engage with the relevant local authority to ensure the project is compatible with the local Air Quality Plan.	<p>Chapter 5: Air Quality of the Environmental Statement (TR010064/APP/6.1) discusses the Air quality Management Area (AQMA), the proposed Clean Air Zone (CAZ) and the impact of the Scheme on these as well as specific engagement with BMBC. Further details are included below.</p> <p>The Scheme is located almost entirely in the Bury AQMA, as shown on Figure 5.2, Air Quality Operational Study Area of the Environmental Statement Figures (TR010064/APP/6.2). The Bury AQMA forms part of the Greater Manchester AQMA and was declared for exceedances of the NO₂ Air Quality Objective (“AQO”) in 2016.</p> <p>In Greater Manchester, the 10 local authorities, Greater Manchester Combined Authority (“GMCA”) and Transport for Greater Manchester (“TfGM”) are working together to develop a Clean Air Plan to tackle exceedances of the annual mean NO₂ Limit Value in the shortest possible time, herein referred to as the Greater Manchester Clean Air Plan (“GM CAP”). Modelling undertaken to inform the development of the GM CAP (GMCA, 2022) indicates that the annual mean NO₂ Limit Value is currently exceeded within the air quality study area adjacent to the A56, immediately to the north of M60 Junction 17, and that compliance is</p>

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		<p>unlikely to be achieved at this location until 2025 (in the absence of any other action).</p> <p>The original GM CAP included a Greater Manchester-wide category C charging CAZ (applicable to buses, coaches, taxis, private hire vehicles, heavy duty vehicles, vans and minibuses), which was designed to comply with a legal direction from Government issued before the COVID-19 pandemic. Since then, there have been significant vehicle supply chain issues, particularly for vans, and the cost of living has increased. This means that the original GM CAP was considered unworkable as it would not have met the obligations in the direction to achieve compliance with the NO2 Limit Value by 2024 and could have caused significant financial hardship for people affected.</p> <p>In February 2022, the Government agreed to lift the legal direction that Greater Manchester should achieve compliance with the NO2 Limit Value in the shortest possible time and by 2024 at the latest. It has since issued a new direction for compliance in the shortest possible time and by 2026 at the latest. As a result, the first phase of the planned Greater Manchester CAZ did not go ahead on 30 May 2022. Greater Manchester local authorities have submitted the case for a new GM CAP, with a no charging CAZ, to Government.</p> <p>Due to this current uncertainty, no CAZ has been incorporated in the assessment of the Scheme. In addition, it is also unlikely that a CAZ would still be in place by the opening year of 2029 due to the natural turnover of the fleet meaning that enforcing EURO 4 (petrol) and EURO VI (diesel) vehicles would be obsolete (as most vehicle would already meet these standards). However, the Scheme has been assessed for Limit Value compliance.</p> <p>Chapter 5, Air Quality in the Environmental Statement (TR010064/APP/6.1) outlines the technical engagement that has taken place with BMBC and the residual potential effect of the Scheme to exceed relevant Limit Values or Air Quality Objectives (AQOs). Where an AQO or Limit Value is exceeded, and there is either a new exceedance or a deterioration in an existing exceedance, then this will have been considered further to understand this effect. However,</p>

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		<p>the assessment outlines that the Scheme will not result in any new exceedances or the deterioration of any existing exceedances for human health receptors. The effect of the operation of the Scheme on air quality at human health receptors and on Limit Value/target compliance receptors is considered to be not significant. Therefore, no significant effects are reported.</p> <p>Changes in nitrogen deposition as a result of the operation of the Scheme have the potential to impact sensitive habitats within designated ecological sites, the potential significance of which is considered further within Chapter 8: Biodiversity of the Environmental Statement (TR010064/APP/6.1), which concludes that there are no significant effects from nitrogen deposition from operation of the Scheme.</p>
Greenhouse Gas emissions		
<i>Applicant's assessment</i>		
5.29	<p>A whole life carbon assessment should be used to measure greenhouse gas emissions at every stage of the proposed development to ensure that emissions are minimised as far as possible as we transition to net zero. This includes the construction, maintenance, operation and use of the asset across its entire lifecycle. This is critical at early stages of project planning, for example, the conception stage, because the ability to reduce whole life carbon emissions is increasingly more limited as the project passes through detailed design and enters construction.</p>	<p>See the response to draft NPS NN paragraph 5.30.</p> <p>The impact of the Scheme on GHG emissions is considered within Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1). The assessment makes reference to the Climate Change Act 2008 (as amended), which includes a legally binding target for the Government to cut GHG emissions to net zero, against the 1990 baseline, by 2050. This net zero target supersedes the previous 80% reduction by 2050 target referred to in the NPS NN. Relevant UK carbon budgets, plans and policies are also discussed.</p>

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5.30	<p>All proposals for national network infrastructure projects should include a whole life carbon assessment at critical stages in the project lifecycle, for example, the submission of a major business case. This should be conducted according to the guidance, standards and methodologies set out in Transport Appraisal Guidance Unit A3.</p>	<p>A whole life carbon assessment has been undertaken at the current Preliminary Design Stage of the Scheme, in accordance with Transport Analysis Guidance (TAG) Unit A3 (DfT, 2023b), which has been used to inform the business case for the Scheme. An Outline Carbon Management Plan at Appendix O of the First Iteration EMP (TR010064/APP/6.5) accompanies the application for development consent.</p>
5.31	<p>Having regard to current knowledge, a carbon management plan should be produced as part of the Development Consent Order submission and include:</p> <ul style="list-style-type: none"> • an explanation of the steps that have been taken to drive down climate change impacts at each of those stages. • how operational emissions and, where applicable, emissions from maintenance activities, have been reduced as much as possible through the application of best available technology for that type of technology (recognising that in the case of road projects while the developer can estimate the likely emissions from road traffic, it is not solely responsible for controlling them). • whether and how any residual carbon emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of 	<p>An Outline Carbon Management Plan, which is included in Appendix O of the First Iteration EMP (TR010064/APP/6.5), has been produced for the current Scheme stage (i.e. the preliminary design stage), which is focussed on reducing embodied carbon emissions (e.g. emissions associated with the production of raw materials). The Outline Carbon Management Plan will be developed into the Carbon Management Plan, under the Second Iteration EMP, which is secured through Requirement 4 of the draft DCO (TR010064/APP/3.1).</p>

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	<p>those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if statutory sectoral targets are developed and come into force.</p>	
<i>Mitigation</i>		
5.32	<p>Applicants should look for opportunities within the design of the proposed development to embed nature-based or technological solutions to mitigate, capture or offset the emissions of construction.</p>	<p>Measures have been embedded within the Scheme design to reduce construction phase GHG emissions as described in Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1).</p> <p>The results of Scheme specific soil surveys and ground investigations indicate that there are limited existing peaty soils within the Order Limits. However, as peaty soils are a carbon store, which if disturbed can result in emissions of GHGs, an Outline Soil Management Plan has been produced and can be found at Appendix F of the First Iteration Environmental Management Plan (TR010064/APP/6.5). The Outline Soils Management Plan outlines the strategy if peaty soils are encountered. Where peat excavation cannot be avoided through design alterations, alternative peat management techniques will be followed. The Outline Soils Management Plan will be developed into a Soils Management Plan as part of the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p>
5.33	<p>Steps taken to minimise, capture and offset emissions in design and construction, should be set out in a Greenhouse Gas Reduction Strategy secured under the Development Consent Order. This Strategy could include, for example, mitigation through woodland</p>	<p>Appendix O: Outline Carbon Management Plan of the First Iteration EMP (TR010064/APP/6.5) describes the steps that will be taken to minimise GHG emissions during construction. Relevant embedded (design) and essential mitigation measures are also described in Section 14.9 of Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1).</p>

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	creation on or adjacent to the site and registered with the Woodland Carbon Code contributing significantly to offsetting residual emissions. Applicants may wish to refer to the Institute of Environmental Management and Assessment Greenhouse Gas Management Hierarchy guidance when drafting their Greenhouse Gas Reduction Strategy.	Additional areas of woodland would be created within the Order Limits, which is estimated to result in small increase in carbon sequestration (a net benefit) during the operation of the Scheme. There are currently no plans to register this woodland with the Woodland Carbon Code.
5.34	The Secretary of State must be satisfied that the applicant has as far as possible assessed the greenhouse gas emissions at all stages of the development.	See the response to draft NPS NN paragraph 5.29 and draft NPS NN paragraph 5.30.
5.35	S.1(1) of the Climate Change Act 2008 reflects and puts into effect the UK's Nationally Determined Contributions as set out in the Paris Agreement and sets out that the carbon budgets are the mechanism by which the net zero target is to be achieved. Consequently, it can be reasonably concluded that an applicant who assesses the carbon impacts of its scheme against the carbon budget is to be taken as also to have assessed the carbon impacts of the scheme against the net zero target in the Climate Change Act 2008 and the UK's Nationally Determined Contributions, where the carbon budget is consistent with the Climate Change Act 2008 carbon target and the Nationally Determined Contributions.	As set out in Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1,) changes in GHG emissions as a result of the Scheme, have been compared against carbon budgets, which are the mechanism by which the net zero target is to be achieved.

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5.36	<p>The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the total greenhouse as emissions from the whole life carbon perspective. The Secretary of State should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and within the proposed development. However the important role national network infrastructure plays in supporting the process of economy wide decarbonisation, the Secretary of State accepts that there are likely to be some residual emissions from construction of national network infrastructure.</p>	<p>The 'Net Zero Highways' (National Highways, 2021) sets out the Applicant's programme for achieving net zero GHG emissions for the SRN by 2050.</p> <p>Appendix O, the Outline Carbon Management Plan which is part of the First Iteration EMP (TR010064/APP/6.5) includes mitigation measures to reduce carbon in line with net zero targets for both construction and maintenance operations, such as:</p> <ul style="list-style-type: none"> • Preparation and implementation of a Logistics Management Plan (or similar) to manage the transport to/from and onsite of employees and materials required for the construction of the Scheme. The Logistics Management Plan (or similar) will set out measures where practicable, to reduce distances travelled, optimise journeys and use low emission modes of transport (such as public transport) or vehicles (e.g. electric vehicles) to reduce GHG emissions associated with transport. • Seeking to source materials from local suppliers, where practical and cost-effective to do so, in order to reduce the travel distance of materials and associated GHG emissions. • Measures to reduce the magnitude of GHG emissions associated with the use of materials and waste. Appendix G, Outline Materials Management Plan is provided in the First Iteration EMP (TR010064/APP/6.5). • See the response to paragraph 5.33 with regard to nature based solutions incorporated into the Scheme.
5.37	<p>Operational greenhouse gas emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that net increase in operational greenhouse gas emissions is not, in itself, reasons to prohibit</p>	<p>Operational GHG emissions associated with the Scheme are compared to Carbon Budgets in Chapter 14 Climate of the Environmental Statement (TR010064/APP/6.1).</p> <p>Whilst the Scheme is estimated to result in an increase in GHG emissions during operation. The impact of the Scheme on climate (i.e. GHG emissions) is, however, considered to be not significant as it is considered unlikely to have a</p>

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	<p>the consenting of national network projects or to impose more restrictions on them in the planning policy framework. Any carbon assessment will include an assessment of operational greenhouse gas emissions, but the policies set out in chapter 2 of the NPS, apply to these emissions. Operational emissions will be addressed in a managed, economy wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable can be consistent with meeting carbon budgets, net zero and the UK's Nationally Determined Contribution.</p>	<p>material impact on the ability of UK Government to meet its carbon reduction targets.</p>
<p>Biodiversity and nature conservation</p>		
<p><i>Applicant's assessment</i></p>		
<p>5.41</p>	<p>The applicant should consider the full range of potential impacts on ecosystems (including habitats and protected species) and provide environmental information proportionate to the likely impacts of the infrastructure on biodiversity and nature.</p>	<p>Design changes have been implemented where practicable to avoid impacts to ecological receptors. These are discussed within Chapter 3: Assessment of Alternatives and Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1). The approach providing overall Biodiversity Net Gain is set out in Appendix 8.12: Biodiversity Net Gain Report of the Environmental Statement Appendices (TR010064/APP/6.3).</p>

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5.42	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geographical conservation interests as well as consider how their proposal will deliver Biodiversity net gain in line with the requirements in a Biodiversity Gain Statement as set out in paragraphs 4.20 to 4.23 above.	See the response to draft NPS NN paragraph 5.41 and draft NPS NN paragraph 4.20.
<i>Mitigation</i>		
5.43	<p>To avoid harm or disturbance in line with the mitigation hierarchy the applicant should demonstrate:</p> <ul style="list-style-type: none"> • developments are designed to avoid the risk of harm and to minimise the footprint of the development and / or to retain the site's important habitat features. • developments are designed and landscaped to provide green corridors and minimise habitat fragmentation (for example using underpasses or green bridges to link habitats). • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works. • during construction and operation, best practice will be followed to ensure that 	<p>The Scheme design includes habitat retention, creation and enhancement to woodland and grassland habitats. Specific areas of enhancement include:</p> <ul style="list-style-type: none"> • Particular attention has been given to the retention of existing vegetation. • Hedgerows and woodland in the vicinity of the Northern Loop. • Linear tree belts adjacent to Prestwich Heys Football Club sports ground. • Hedgerows and vegetation along Mode Hill Lane, Egypt Lane and Corday Lane. • Linear tree belts along the verge of the M60 northbound to westbound diverge. • An important hedgerow and highways woodland belt west of Pond 5, near Heaton Park. • A narrow belt of trees and shrubs along the M60 verge adjoining Kenilworth Road. <p>Reinstatement planting and seeding will use native species as appropriate to the location and will be overseen by Ecologists and Arboriculturists. New road verges will support low-nutrient grassland habitats which are of high ecological</p>

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	<p>risk of disturbance or damage to species and habitats follow the mitigation hierarchy (including as a consequence of transport access arrangements). For example, plan for construction work to be carried out at specific times to avoid sensitive times and location, such as breeding season for wild birds and lifecycles for migratory fish.</p>	<p>value. No topsoil will be applied to these areas which will be sown with a commercial and locally native seed mix appropriate to the geology.</p> <p>The habitat will be managed to maximise ecological delivery. On the inherently linear road verges of the Scheme, the creation of low-nutrient grasslands will provide an important wildlife corridor, as under these conditions native wildflowers have space to germinate and thrive amid reduced competition.</p> <p>Connectivity of habitats will be maximised through provision of new hedgerow planting and planting to improve existing hedgerows in areas adjacent to the ecological areas, along highway boundaries and around attenuation ponds. New hedgerow tree planting will also be provided to strengthen new and existing hedgerows. Aquatic and marginal planting will be provided at the five attenuation ponds and swales to improve biodiversity.</p> <p>Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) visually presents these enhancements.</p>
5.44	<p>If avoidance or reduction of harm is not possible, applicants should include appropriate mitigation measures, in line with the mitigation hierarchy, as an integral part of the proposed development, including identifying where and how these will be secured in the long term.</p>	<p>See the response to draft NPS NN paragraph 5.43.</p>
5.45	<p>If avoidance or bespoke mitigation measures are insufficient or not possible, as a last resort, appropriate compensation measures should be sought and implemented. For example, moving protected species out of the development site and where practicable,</p>	<p>Preconstruction surveys for bats will be undertaken for all trees to be felled and all trees within a radius of potential disturbance affects. Should surveys confirm the presence of roosting bats, a licence will be sought from Natural England (to ensure legal compliance) and felling operations / construction will be conducted in accordance with a method statement which will require exclusion of roosting</p>

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	<p>restore habitats after construction works have finished.</p>	<p>features, soft felling, and timing of works to avoid sensitive seasons for bats as appropriate.</p> <p>Bat boxes will be provided to mitigate for the loss of potential roost features with suitability to support roosting bats in the future. Boxes will be provided at a ratio of 2:1 for every tree lost to account for variance in bat roosting preferences. Boxes will comprise a range of types to also account for variance in bat roosting preferences.</p> <p>Where impacts from habitat lost as a result of construction of the Scheme cannot be avoided, mitigation will be provided through the provision of newly created habitat. This has been designed so that connectivity is maintained within the wider landscape.</p> <p>Creation of new habitat within landscaping and mitigation areas has been designed to enhance bat foraging opportunities, for example through the provision of native flowering trees and shrubs that would attract invertebrate prey species.</p> <p>As set out in the Consents and Agreements Position Statement (TR010064/APP/3.3), the Applicant will use Natural England’s District Level Licencing scheme to mitigate the effects on Great Crested Newts. No further mitigation is proposed.</p> <p>Appropriate stand-off distances will be implemented around watercourses where suitable, using physical barriers during construction works to protect aquatic plant and invertebrate species from destruction and disturbance.</p>
5.46	<p>The applicant should not just look to mitigate direct harms but should show how the project has taken advantage of opportunities to conserve and enhance biodiversity, having regard to any relevant Local Nature Recovery Strategy. Opportunities will be taken to enhance or expand existing habitats</p>	<p>Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) includes measures which will provide enhancements both of habitats, and for protected and notable species. Implementation of Figure 2.3: Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) would provide a net gain in the biodiversity value of the site, with a 3.68% gain in habitats and a 58.50% gain in hedgerows as measured by Metric 3.1 (see</p>

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	and create new habitats in accordance with biodiversity net gain requirements. Habitat creation, enhancement and management proposals should include measures for climate resilience, including appropriate species selection. Maintaining habitat connectivity is important for climate resilience and the biodiversity of ecological networks.	Appendix 8.12 Biodiversity Net Gain Report of the Environmental Statement Appendices (TR010064/APP/6.3)). While the biodiversity assessment does not explicitly include a natural capital or ecosystem services assessment, impacts on habitats and species have been considered in the context of maintaining connectivity, maximising biodiversity delivery and the retention of sensitive ecological features, as demonstrated by the habitat net gains as stated above.
5.47	Wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures in order to maximise multi-functional benefits whilst minimising land take. For example, this can be achieved through integration of Biodiversity net gain features within a sustainable drainage system; the use of green roofs and walls to harvest rainwater and ameliorate urban heating; or the restoration of rivers to reduce flood risk and provide attractive amenity areas.	See draft NPS NN paragraph 5.46 above.
5.48	The Secretary of State should consider what appropriate requirements should be attached to any consent and / or any planning obligations entered into to ensure that any necessary mitigation and compensatory measures are secured, delivered, and if necessary enforced, and that biodiversity improvements are registered in accordance with Biodiversity net gain requirements.	As set out in the Consents and Agreements Position Statement (TR010064/APP/3.3), the Applicant will use Natural England’s District Level Licencing scheme to mitigate the effects on Great Crested Newts. Appendix N, Outline Landscape and Ecology Masterplan is also provided in the First Iteration EMP (TR010064/APP/6.5). This is secured by Requirement 4 of the draft DCO (TR010064/APP/3.1).

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5.49	<p>The Secretary of State will need to take account of the advice provided to the applicant by Natural England and / or the Marine Management Organisation, as regards any necessary mitigation measures and whether Natural England an / or the Marine Management Organisation has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences. In advance of formal submission, applicants are encouraged to use Natural England’s Letter of No Impediment approach and engage with Natural England.</p>	<p>A district level licence “DLL) will be obtained for great crested newt (GCN). The Applicant has secured an Impact Assessment and Conservation Payment Certificate (“IACPC”) which has been countersigned by Natural England (see Appendix 8.15: GCN District Level Licence Impact Assessment & Conservation Payment Certificate of the Environmental Statement appendices (TR010064/APP/6.3)).</p> <p>A licence will be required to interfere with (close) badger setts. A draft badger licence has been prepared and agreed with Natural England. The Applicant is seeking a Letter of No Impediment (LONI) from Natural England with respect to badger. Further details are included in the Consents and Agreements Position Statement (TR010064/APP/3.3).</p> <p>The REAC contained within the First Iteration EMP (TR010065/APP/6.5) sets out the mitigation measures the Scheme will deliver to offset the impacts on habitats and species as a result of the Scheme including Appendix N, Outline Landscape and Ecology Management Plan. The First Iteration EMP will be developed into the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p> <p>No Marine Management Organisation (MMO) licences are required for the Scheme.</p>
<i>Decision making</i>		
5.50	<p>The government’s 25 year Environmental Plan marked a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government’s Environmental Improvement Plan, the United Nations Environmental Programme Convention on Biological Diversity of 1992</p>	<p>The assessment presented in Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) has taken into consideration the United Nations Convention on Biological Diversity 1992 and Strategic Plan for Biodiversity 2011 – 200 (“the ‘Aichi’ targets”).</p> <p>Section 8.9 of Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) details the embedded design measures and essential mitigation which have been identified to avoid significant harm to biodiversity</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>and any relevant measures and targets, such as the Environment Act 2021 targets. In doing so, the Secretary of State should also take account of the context of the challenge of climate change; failure to address this challenge will result in significant adverse impacts to biodiversity. The benefits of nationally significant low carbon transport infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh the harm to those interests. However, the mitigation hierarchy will still need to be applied.</p>	<p>arising from the construction and operation of the Scheme. These measures are listed in the REAC included in the First Iteration EMP (TR010064/APP/6.5). The First Iteration EMP will be developed into the Second Iteration EMP of which Implementation and compliance is a condition of the granted DCO as secured by Requirement 4 of the draft DCO (TR010064/APP/3.1).</p> <p>The Environment Act 2021 sets out the mandatory provision of at least 10% biodiversity net gain of that lost to a Scheme. This is expected to be mandatory for all NSIPs by November 2025. There is currently no legal requirement for the Scheme to provide biodiversity net gain. Nevertheless, the Applicant has sought to maximise biodiversity delivery within the Order Limits through provision of new habitats within the landscaping scheme and enhancement of existing retained vegetation, forecasting an overall net gain of 3.68% for habitats and 58.50% for hedgerows on-site post-construction as detailed in Appendix 8.12, Biodiversity Net Gain Report of the Environmental Statement Appendices (TR010064/APP/6.3). Enhancement measures relevant to biodiversity for the Scheme are described in Section 8.9 of Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) and include enhancements to woodland and grassland habitats.</p>
<i>Internationally important nature sites</i>		
5.53	<p>The most important sites for biodiversity in the UK are those identified and designated to meet the obligations of international biodiversity conventions, and which are afforded special protection by the Habitats Regulations. These sites are designated as Special Areas of Conservation and Special Protection Areas and are collectively known as Habitat Sites. The following should be given the same protection as sites legally protected by the Habitats Regulations: potential Special Protection Areas and</p>	<p>There are no European sites within the Order Limits but the Rochdale Canal SAC (SAC), and Site of Scientific Interest (SSSI) is located close to the ARN to the east of the Scheme. The location of this SAC and SSSI is shown on Figure 8.13.1, Location of European Sites of Appendix 8.13 of the Environmental Statement Appendices (TR010064/APP/6.3). Likely significant effects on internationally, nationally and locally designated sites, habitats and species are considered in Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) which concludes no significant adverse effects on any of these receptors.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>possible Special Areas of Conservation, listed or proposed Wetlands of International Importance (Ramsar sites), and sites identified, or required, for compensatory measures for adverse effects on habitat sites.</p>	<p>The Habitats Regulations Assessment Report (“HRA”) provided in Appendix 8.13, HRA of the Environmental Statement Appendices (TR010064/APP/6.3) also assessed likely significant effects on internationally designated sites.</p> <p>A Stage 1 Screening Assessment concluded that likely significant effects could not be discounted for the Rochdale Canal SAC and SSSI, when considered alone or in-combination with other plans and projects. This meant that a Stage 2, Statement to Inform an Appropriate Assessment, must be carried out. This concludes that the Scheme will not adversely affect the integrity of the Rochdale Canal SAC and SSSI during its construction or operational phases, either alone or in combination with other plans or projects and therefore Stage 2 of the HRA process is not required.</p> <p>The Applicant sought the advice of Natural England in producing the HRA through the statutory consultation in February 2023. This advice has been followed by progressing the HRA to Stage 2 appropriate assessment. Subsequent consultation with Natural England has been undertaken throughout 2023 under a Discretionary Advice Service contract and the Applicant has had due regard to Natural England’s advice feedback in completing the assessment. Appendix 8.13: Habitats Regulations Assessment Report of the ES Appendices (TR010064/APP/6.3) has been shared with Natural England for their review and feedback and Natural England have confirmed that they agree with the conclusions of the HRA and have no further comments.</p> <p>There are no potential Special Protection Areas (SPA), possible Special Areas of Conservation, listed or proposed Ramsar sites, or sites identified, or required, as compensatory measures for adverse effects on European sites, potential SPAs, possible SACs and listed or proposed Ramsar sites within the zone of influence of the Scheme.</p>
5.54	<p>The Habitats Regulations set out a specific process (see paragraphs 4.12 to 4.16) to assess the likely implications for these sites</p>	<p>See the response to draft NPS NN paragraph 5.53.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>from a proposed plan or project, To maintain the overall cohesion of the National Site Networks, such plans or projects may only proceed if the assessment concludes they will not adversely affect the integrity of the site or, in the case of a negative assessment, if there are no alternative solutions, and they must proceed for imperative reasons of overriding public interest with the necessary compensatory measures secured.</p>	
5.56	<p>Where a proposed development on land within or outside of a Site of Special Scientific Interest is likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) development consent should not normally be consented. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The Secretary of State is bound by the duty placed on all public bodies in section 28G of the Wildlife and Countryside Act 1981 to take reasonable steps, consistent with the proper exercise of their functions, to further conservation and enhancement of the features by reason of which a site is of special scientific interest.</p>	<p>Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) identifies SSSI within the zone of influence of the Scheme.</p> <p>There are no SSSIs located within 2km of the Order Limits, however, Ashclough SSSI and Nob End SSSI are hydrologically connected to the Scheme via the River Irwell, the River Roch and various tributaries of the River Roch, and Rochdale Canal SSSI (and SAC) is located within 200m of the ARN.</p> <p>A Stage 1 Screening Assessment concluded that likely significant effects could not be discounted for the Rochdale Canal SAC and SSSI, when considered alone or in-combination with other plans and projects. This meant that a Stage 2, Statement to Inform an Appropriate Assessment, must be carried out. This concludes that the Scheme will not adversely affect the integrity of the Rochdale Canal SAC and SSSI during its construction or operational phases, either alone or in combination with other plans or projects and therefore Stage 2 of the HRA process is not required.</p> <p>The Applicant sought the advice of Natural England in producing the HRA through the statutory consultation in February 2023. This advice has been followed by progressing the HRA to Stage 2 appropriate assessment. Subsequent consultation with Natural England has been undertaken throughout</p>

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		<p>2023 under a Discretionary Advice Service contract and the Applicant has had due regard to Natural England’s advice feedback in completing the assessment. Appendix 8.13: Habitats Regulations Assessment Report of the ES Appendices (TR010064/APP/6.3) has been shared with Natural England for their review and feedback and Natural England have confirmed that they agree with the conclusions of the HRA and have no further comments.</p> <p>Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) provides a detail assessment of the potential impacts to those SSSI with hydrological connectivity to the Scheme due to construction and operation of the Scheme and concludes there will be no significant adverse effects on any of the SSSI identified.</p>
<i>Irreplaceable habitats including ancient woodland, and ancient and veteran trees</i>		
5.57	<p>Ancient woodland, ancient wood pastures and parkland, and ancient and veteran trees are irreplaceable habitats. Their long-standing presence, species and form serve as a rich cultural record of past management practices. Ancient and veteran trees are a valuable biodiversity resource for diversity of species and unique ecological conditions, once lost they cannot be recreated. Many ancient woodlands provide ecosystem services, for example, water and soil health, carbon storage, flood alleviation and pollution mitigation as well as providing public access allowing people to make important contact with nature that helps to promote interest in the protection of these habitats, while delivering many health and</p>	<p>During site clearance there will be a loss of 0.88km of hedgerows of the 2.56km assessed within the Order Limits. This will be mitigated through the creation of 1.48km of new hedgerows.</p> <p>No veteran trees or ancient woodland are impacted by the Scheme, either directly or indirectly. The assessment in Appendix 8.2, Designated Sites Air Quality Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) concludes that there will be no significant effect on the veteran or ancient trees.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>wellbeing benefits. Keepers of Time, the government’s policy for ancient and native trees and woodlands in England, sets out the government’s commitment to maintain and enhance the existing area of ancient woodland and to maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active management.</p>	
5.58	<p>The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees unless there are wholly exceptional reasons (for example, where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.</p>	<p>See the response to draft NPS NN paragraph 5.57.</p>
<p><i>Nationally important nature sites: Marine Conservation Zones</i></p>		
5.59	<p>Marine Conservation Zones, introduced under the Marine and Coastal Access Act 2009, have been designated for the purpose of conserving marine flora or fauna, marine habitats or types of marine habitat or</p>	<p>The Scheme will not impact any marine conservation zones.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>features of geological or geomorphological interest. The protected feature or features and the conservation objective for the Marine Conservation Zones are stated in the designation order for the Marine Conservation Zones, which provides statutory protection for these areas. Measures to restrict damaging activities will be implemented by the Marine Management Organisation and other relevant organisations. As a public authority, the Secretary of State is bound by the duties in relation to Marine Conservation Zones imposed by sections 125 and 126 of the Marine and Coastal Access Act 2009.</p>	
<i>Locally important nature sites</i>		
5.60	<p>Sites of regional and local biodiversity and geographical interest, which includes Local Geographical Sites, Local Nature Reserves, and Local Wildlife Sites and Nature Improvement Areas, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature recovery. They can also provide wider benefits including contributing to the quality of life and wellbeing of the community and in supporting research and education. The Secretary of State should give due consideration to any such harm to the detriment of biodiversity features of regional</p>	<p>As shown on Figure 8.1.2, Statutory and Non Designated Sites of Appendix 8.1 of the Environmental Statement Appendices (TR010064/APP/6.3), Hazlitt Wood Site of Biological Interest (SBI) is immediately adjacent to the southern extent of the Order Limits, west of the M60. Therefore, it is assessed as being at high risk of dust deposition from construction.</p> <p>Appendix A, Outline Air Quality and Dust Management Plan included as part of the First Iteration EMP (TR010064/APP/6.5) includes the following measures to limit the impact of dust during construction, which will mitigate the potential impacts during construction from dust on Hazlitt Wood SBI:</p> <ul style="list-style-type: none"> • Ensure an adequate water supply on the site for effective dust/particulate matter suppression should it be required. Use non-potable water where practicable and appropriate for dust suppression where available.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>or local importance which it considers may result from the proposed development. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, nevertheless the mitigation hierarchy applies to these sites.</p>	<ul style="list-style-type: none"> • Minimise drop heights from loading shovels, and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate. • Where required and appropriate use enclosed chutes and covered skips. • Avoid dry sweeping of areas if causing visible dust emissions and the area is within 350m of human receptors. • Ensure an adequate water supply on the site for effective dust/particulate matter suppression should it be required. Use non-potable water where practicable and appropriate for dust suppression where available. • Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. • Avoid dry sweeping of large areas. • Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. • Implement a wheel washing system with rumble grids or other suitable methods to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable. • Inspect haul roads, including crossing points on the existing highway, for integrity and instigate any necessary repairs to the surface as soon as reasonably practicable. • Install hard surfaced haul roads, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned. • Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. • The movement of construction traffic around the site will be kept to the minimum reasonable for the effective and efficient operation of the site and construction of the Scheme.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<ul style="list-style-type: none"> The use of diesel or petrol powered generators will be reduced by using mains electricity, hybrid generators, hydrogen generators, solar panels or battery powered equipment where reasonably practicable. <p>With these mitigation measures in place, it is unlikely that there will be any significant adverse effects resulting from construction dust on Hazlitt Wood SBI.</p> <p>Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) concludes that all other local nature conservation areas in the surrounding area will not experience any negative effects, including from nitrogen deposition as a result of the operation of the Scheme.</p>
<i>Biodiversity within and around developments</i>		
5.61	Development proposals provide many opportunities for incorporating beneficial biodiversity or geological features as part of good design.. Nature contributes to the quality of a place, to people’s quality of life, the attractiveness of active travel routes and movements, and it is a critical component of well-designed development. Road and rail projects can also play a part in meeting government tree planting and nature recovery targets through partnership working with adjoining landowners, delivery biodiversity, carbon offsetting and social benefits.	See the response to draft NPS paragraph 4.24 and draft NPS paragraph 5.62.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.62	<p>Consideration should be given to the impacts on, and improvements to, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, relevant to the local area and communities. The value of linear infrastructure and its footprint in supporting biodiversity and connecting habitats ecosystems should also be taken into account. Local Nature Recovery Strategies will identify opportunities to create or enhance habitat likely to have greatest benefit to biodiversity and wider environmental improvement. Consideration should also be given to national priorities and targets, such as reduced flood risk, improved air or water quality, and increased access to natural greenspace, or tree planting, woodland creation and protecting long established woodlands.</p>	<p>Figure 2.3: Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) has been designed to provide green corridors and minimise habitat fragmentation. New road verges will support low-nutrient grassland habitats which are of high ecological value. On the inherently linear road verges of the Scheme, the creation of low-nutrient grasslands will provide an important wildlife corridor, as under these conditions native wildflowers have space to germinate and thrive amid reduced competition.</p> <p>In addition, connectivity of habitats will be maximised through provision of new hedgerow planting, along new National Highway boundaries and around attenuation ponds (commitment LV5 of the REAC contained within the First Iteration EMP (TR010064/APP/6.5)). New hedgerow tree planting will also be provided to strengthen new and existing hedgerows (commitment LV6 of the REAC contained within the First Iteration EMP).</p> <p>Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) includes measures which will provide enhancements both of habitats, and for protected and notable species. Implementation of Figure 2.3: Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) will provide a net gain in the biodiversity value of the site, with a 3.68% gain in habitats and a 58.50% gain in hedgerows as measured by Metric 3.1 (see Appendix 8.12 Biodiversity Net Gain Report of the Environmental Statement Appendices (TR010064/APP/6.3)).</p> <p>The ecological feature have taken into consideration the Strategic Plan for Biodiversity 2011 – 2020 (the ‘Aichi’ targets).</p>
5.63	<p>When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities and enhancement of wider biodiversity, in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to</p>	<p>See the response to draft NPS NN paragraph 5.49.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	ensure that such beneficial features are delivered, and ongoing management and maintenance secured.	
<i>Habitats and Species of Principal Importance</i>		
5.64	<p>Many individual wildlife species receive statutory protection under a range of legislative provisions. Some species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. As a public authority, the Secretary of State is bound by the duty in by section 40 of the Natural Environment and Rural Communities Act 2006 (as amended by section 102 of the Environment Act 2021) to periodically consider what action an authority can take, consistent with the exercise of its functions, to further the conservation and enhancement of biodiversity. In doing so, the Secretary of State may consider the impact on species and habitats listed under section 41 of the Act. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of the development by using requirements, planning obligations, or licence conditions, The Secretary of State should refuse consent where harm to habitats or species</p>	<p>Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) presents an assessment of the effects on species and habitats of principal importance for biodiversity (priority habitats and species). Data searches and field surveys have been used to identify protected and notable habitats and species within the zone of influence (the area over which ecological features may be affected by changes as a result of the Scheme). Impacts as a result of the Scheme have been assessed and, where necessary, measures to avoid, reduce and mitigate these impacts are included. Mitigation measures including protected species licensing are included in Appendix N, Outline Landscape and Ecology Management Plan within the First iteration EMP (TR010064/APP/6.5). The Outline Landscape and Ecology Management Plan will be developed into the Landscape and Ecology Management Plan as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.	
Resource and Waste Management		
<i>Applicant's assessment</i>		
5.66	<p>The applicant should demonstrate that they will adhere to the waste hierarchy, minimising the volume of waste produced and maximising reuse and recycling for waste that cannot be avoided. Where possible, applicants are encouraged to use low carbon materials, sustainable sources, and local suppliers. Consideration should be given to circular economy principles wherever practicable, for example, by using longer lasting materials efficiently, optimising the use of secondary materials and how the development will be maintained and decommissioned. Applicants should consider and take into account emerging government policy including the Waste Prevention Programme for England and Defra's Construction Code of Practice for Sustainable Use of Soils on Construction Sites, which provides practical guidance on how to improve appropriate soil reuse on construction sites and reducing the volume that is sent to landfill.</p>	<p>Chapter 10: Material Assets and Waste of the Environmental Statement (TR010064/APP/6.1) sets out how waste will be managed during construction including how the Scheme will deliver sustainable waste management that adheres to the waste hierarchy and supports the transition to a circular economy.</p> <p>Section 10.9 (Design, mitigation and enhancement measures) of Chapter 10 Materials Assets and Waste of the Environmental Statement (TR010064/APP/6.1) sets out how the Applicant intends to minimise both the quantity of waste produced and the disposal of waste to landfill during the construction of the Scheme in line with the waste hierarchy.</p> <p>The Applicants environment team has worked in close collaboration with its infrastructure design team to avoid or prevent waste through the Scheme design. This includes the consideration of the following design measures, amongst others:</p> <ul style="list-style-type: none"> • Optimising the cut-fill balance to reduce materials and waste. • The location and extent of carriageway widening. • The alignment of the new offline carriageway. • Retention of existing highway structures and assets. <p>A Sustainable Procurement Plan will be prepared, as part of the Second Iteration EMP , for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>The Sustainable Procurement Plan will set out a clear framework to increase the procurement and use of sustainably and responsibly sourced construction materials and products during the construction of the Scheme.</p> <p>The Sustainable Procurement Plan will specify, amongst other things the: use of locally sourced and secondary materials, where available and permitted by the Specification for Highway Works, and where practicable and cost-effective to do so. Consideration of low carbon materials is covered in Chapter 14, Climate of the Environmental Statement (TR010064/APP/6.1).</p> <p>An essential mitigation measure has been included as commitment M1 in the REAC, contained within the First Iteration EMP (TR010064/APP/6.5)), that requires consideration of how materials can be designed to be more easily adapted over the asset's lifetime and how de-constructability of elements can be increased at end of first life.</p> <p>An Outline Site Waste Management Plan, at Appendix C of the First Iteration Environmental Management Plan (TR010064/APP/6.5), sets out how the Scheme will plan, implement, monitor and review waste reduction and management during the detailed design and construction stages of the Scheme.</p> <p>The Outline Site Waste Management Plan will be developed into the Site Waste Management Plan as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p> <p>The Outline Site Waste Management Plan will be updated on a regular basis during construction and it will be used to forecast waste arisings and enable practical decisions to be taken at detailed design and construction regarding waste prevention and the segregation of materials on-site for reuse, recycling, recovery or disposal.</p> <p>While Chapter 10: Material Assets and Waste of the Environmental Statement (TR010064/APP/6.1) has taken account of the emerging Government policy outlined in Section 10.3 (Legislative and policy framework), consideration of the</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>Defra (2011) Soils Code of Practice and other measures to ensure the sustainable use of soils has been made in Chapter 9: Geology and Soils of the Environmental Statement (TR010064/APP/6.1).</p> <p>In order to promote sustainable reuse of soil and other excavated arisings within the Scheme, an Outline Materials Management Plan has been prepared in line with the protocols within the CL:AIRE Definition of Waste (2011) guidance so that excavated materials are reused appropriately and sustainably.</p> <p>The Outline Materials Management Plan, which can be found in Appendix G of the First Iteration EMP (TR010064/APP/6.5), will be developed into the Materials Management Plan as part of the Second Iteration EMP secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p> <p>An Outline Soil Management Plan has also been produced and can be found at Appendix F of the First Iteration EMP (TR010064/APP/6.5). Again, this will be developed into a Soils Management Plan as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p>
<i>Mitigation</i>		
5.67 – 5.68	<p>Sustainable waste management is implemented through the waste hierarchy:</p> <ul style="list-style-type: none"> • prevention • preparing for reuse • recycling • other recovery, including energy recovery • disposal <p>Waste management beyond the waste hierarchy is also encouraged, such as adopting a circular approach from the offset,</p>	See the response to draft NPS NN paragraph 5.66 which demonstrates compliance with the waste hierarchy.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	for example, sustainable procurement exercises.	
5.69	Large infrastructure projects may generate hazardous and non-hazardous waste during construction and operation. The Environmental Permitting regime, regulated by the Environment Agency in England, incorporates operational waste management requirements for certain activities. Applicants should therefore give consideration to the Environmental Permitting regime and whether this applies to their development.	The Applicant has considered the applicability of the Environmental Permitting regime for waste management by means of commitment M6 in the REAC contained in the First Iteration EMP (TR010064/APP/6.5) and in the Consents and Agreements Position Statement (TR010064/APP/3.3). It is not anticipated that the Environmental Permitting regime will apply to the on-site management of waste generated during construction.
5.70	Infrastructure projects should look to use legal and sustainable timber and other Modern Methods of Construction where possible.	A Sustainable Procurement Plan will be prepared, as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1). The Sustainable Procurement Plan will include a clear framework to increase the procurement and use of sustainably and responsibly sourced construction materials and products. It also requires consideration of modern methods of construction. This also covers designing for off-site construction through maximising the use of pre-fabricated structures and components to encourage a process of assembly rather than construction.
<i>Decision making</i>		
5.71	The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure safe and effective management of waste arising from the construction and operation of the proposed development. It is advised that this is detailed in the dedicated	See the response to draft NPS NN paragraph 5.66, which sets out the processes for the safe and effective management of waste.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>plans summarising the sustainable use of resources and waste for both construction and operation as part of the application documentation. The Secretary of State should be satisfied that the process sets out:</p> <ul style="list-style-type: none"> • how waste will be managed, but on-site and off-site • that consideration has been given to available waste management infrastructure capacity to manage waste arising from the development • adequate steps have been taken minimising the volume of waste arising and maximise opportunities for reuse and recycling. 	
Civil and military aviation and defence interests		
<i>Applicant's assessment</i>		
5.84	<p>The applicant should consult the Ministry of Defence, Civil Aviation Authority, National Air Traffic Services and any aerodrome – licensed or otherwise - likely to be affected by the proposed development in preparing the assessment of the proposal on aviation or other defence interests.</p>	<p>The Applicant has consulted with the Ministry of Defence, Civil Aviation Authority and National Air Traffic Services. The Applicant also engaged with Manchester Airport Group, who operate Manchester Airport, the details of which are described in the Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes ((TR010064/APP/5.2).</p>
5.85	<p>Any assessment on aviation or other defence interests should include potential impacts during construction and operation of the project upon the operation of</p>	<p>The Scheme is not considered to have any effects on civil or military aviation.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	communications, navigation and surveillance infrastructure, flight patterns (both civil and military), other defence assets and aerodrome operational procedures.	
5.86	If any relevant changes are made to proposals for an NSIP during the pre-application period or before the end of the examination of an application, it is the responsibility of the applicant to ensure that the relevant aviation and defence consultees are informed as soon as reasonably possible.	Details of consultation with aviation authorities is set out in the Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes (TR010064/APP/5.2).
5.93	There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that go beyond statutory requirements by any relevant aviation and defence consultees, the Secretary of State should be satisfied of the necessity of such lighting, taking into account the case put forward by the consultees. The effect of such lighting on the landscape, local residents and ecology may be a relevant consideration, depending on the particular circumstances.	<p>No tall lighting which will go beyond statutory requirements is required.</p> <p>The replacement lighting strategy will cover the same extents as the existing lighting and be similar in height but will be of a modern design. It will use light-emitting diode (LED) lighting with G4 luminous intensity class to reduce glare and light spill. To further reduce impact of the lighting strategy, especially during the night-time, central management system (CMS) has been used. This allows, not only to reduce the light spill, but also greatly decreases the carbon footprint and energy usage for the lighting, while reducing maintenance costs and reaction time for any potential failures.</p> <p>Chapter 12 Population and Human Health of the Environmental Statement (TR010064/APP/6.1) considers the impact of lighting on Human Health. The Northern Loop will be lit and this will introduce some lighting in one of the darker areas of the Order Limits near Pike Fold Golf Course. Therefore, the improved lighting standard is balanced somewhat by the introduction of more lit infrastructure. On this basis the magnitude of change for health is assessed as</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>negligible. Relatively few people will be exposed to any change in lighting and the health outcomes are expected to reflect a minor change in quality of life.</p> <p>The visual effects of the Scheme on the landscape, which includes lighting, are covered in the response to draft NPS NN paragraph 5.170. No adverse effects on ecology will occur.</p>
Coastal change and marine impacts		
<i>Applicant's assessment</i>		
5.100	<p>Applications for development consent in a Coastal Change Management Area should make it clear why there is a need for it to be located in a Coastal Change Management Area. For developments requested in a Coastal Change Management Area, the applicants should undertake an assessment of the vulnerability of the proposed development to coastal change, taking account of climate change, during the project's operational life and consult with their Coast Protection Authority and Coast Erosion Risk Management Authority (usually their District Council) regarding the Shoreline Management Plan for that coastal policy unit and coastal change planning policy.</p>	<p>The Scheme is not located in a coastal area.</p>
Dust, odour, artificial light, smoke, steam		
<i>Applicant's assessment</i>		

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.114 – 5.115	<p>The applicant should assess the potential for emissions of odour, dust, steam, smoke and artificial lighting to have a detrimental impact on amenity.</p> <p>In particular, the assessment provided by the applicant should describe:</p> <ul style="list-style-type: none"> • the type and quantity of emissions • aspects of the development which may give rise to emissions during construction, operation and decommissioning • premises, locations or species that may be affected by the emission • effects of the emission on identified premises or locations • measures to be employed in preventing or mitigating emissions 	<p>Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1) states the risk of construction dust is considered to be 'high'. Sensitive receptors within 200m of the Order Limits (human health and designated ecological sites) are shown on Figure 5.7, Construction Dust Results of the Environmental Statement Figures (TR010064/APP/6.2) and outlined in Table 5.21 of Chapter 5 Air Quality, of the Environmental Statement (TR010064/APP/6.1). There are around 2000 sensitive receptors within this distance. The level and distribution of construction dust emissions will depend on where within the Order Limits the dust raising activity takes place, the nature of the activity and controls and weather conditions.</p> <p>Measures to mitigate the impacts of dust during construction are set out in the Outline Air Quality and Dust Management at Appendix A of the First Iteration EMP (TR010064/APP/6.5).</p> <p>The Outline Air Quality and Dust Management Plan will be developed into the Air Quality and Dust Management Plan as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1). The mitigation measures are also listed in the REAC within the First Iteration EMP (TR010064/APP/6.5). The Air Quality and Dust Management Plan will be discussed with BMBC I during the detailed design stage.</p> <p>In terms of any impacts from artificial light, the Landscape and Visual Assessment in Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP/6.1), considers likely significant visual effects during both construction and operation of the Scheme. Effects on aesthetic and perceptual qualities from light pollution effects, including effects on dark skies, local amenity and tranquillity, are acknowledged within the assessment of landscape and visual effects.</p> <p>Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) indicates mitigation measures to address adverse effects from a combination of environmental topics/aspects, including lighting.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>The Applicant has produced a Statement Relating to Statutory Nuisance (TR010064/APP/6.8) which sets out whether the Scheme triggers a statutory nuisance as defined under the Environmental Protection Act 1990 which includes emissions of odour, dust, steam, smoke and artificial light. It concludes that with mitigation measures in place, the Scheme will not trigger a statutory nuisance.</p> <p>In respects of emissions of odour, smoke and steam, these are not addressed in the Environmental Statement as the Scheme will not result in any of these emissions that requires an assessment.</p>
5.116	The applicant is advised to consult the relevant local environmental health team, and where appropriate, the Environment Agency about the scope and methodology of the assessment.	<p>Chapter 4, Environmental Assessment Methodology of the Environmental Statement (TR010064/APP/6.1) demonstrates that all the relevant authorities, including the Environment Agency, were consulted during the planning and scope of the methodology for preparing the Environmental Statement.</p> <p>BMB Environmental Health Services have been consulted as referenced in Chapter 5, Air Quality of the Environmental Statement (TR010064/APP/6.1).</p>
<i>Mitigation</i>		
5.117	The Secretary of State should ensure the applicant has provided sufficient information to show any necessary mitigation will be put in place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial lighting from the development to reduce any loss of amenity which might arise during construction and operation of the development. This should be detailed	See the response to draft NPS NN paragraph 5.114.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	within a Statement Relating to Statutory Nuisance.	
5.118	The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, landscapes and nature conservation, using directed light when necessary.	See the response to draft NPS NN paragraph 5.114.
5.119	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the Development Consent Order.	<p>The only matters prescribed in Section 79(1) of the Environmental Protection Act (EPA) that could potentially occur as a result of the Scheme either during construction or operation are:</p> <ul style="list-style-type: none"> (d) any dust arising on business and residential properties. (fb) artificial light from premises. (g) noise emitted from premises. (ga) noise emitted from or caused by a vehicle, machinery or equipment in the street. <p>The Statement Relating of Statutory Nuisance (TR010064/APP/6.8) concludes that the construction and operational activities that have the potential to create a nuisance will be controlled through mitigation as set out in the First Iteration EMP (TR010064/APP/6.5) which will be developed into the Second Iteration EMP for implementation during construction of the Scheme. The First Iteration EMP contains the REAC and a number of Outline Management Plans, which sets out the mitigation measures that will be provided to offset and manage the</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>construction impacts of the Scheme. This is secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1).</p> <p>The Third Iteration EMP will be developed when the Scheme is completed and set out those ongoing measures required for operation and maintenance.</p> <p>With mitigation in place, none of the statutory nuisances identified in Section 79(1) of the EPA are predicted to arise during the construction or operation of the Scheme.</p>
Flood Risk		
<i>Applicant's Assessment</i>		
5.122	<p>Applications for projects in the following flood zone locations should be accompanied by a Flood Risk Assessment:</p> <ul style="list-style-type: none"> • applications in Flood Zones 2 and 3, which represent a medium and high probability of river and sea flooding • applications in Flood Zone 1 which represent a low probability of river and sea flooding. This includes projects of 1 hectare or greater, projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems • applications where there is less than 1ha in Flood Zone 1, including the change of use in development type to a more vulnerable class (for example, from 	<p>A Flood Risk Assessment (FRA) has been undertaken and can be found at Appendix 13.6 of the Environmental Statement Appendices (TR010064/APP/6.3) and the conclusions summarised in Chapter 13, Road Drainage and the Water Environment of the Environmental Statement (TR010064/APP/6.1). The main findings are:</p> <ul style="list-style-type: none"> • The Scheme is located within Flood Zone 1 and therefore at low risk of flooding from Main Rivers. • The overall flood risk from Ordinary Watercourses (OW) to the Scheme is considered to be moderate due to the areas of surface water flood risk shown on the Risk of Flooding from Surface Water (RoFSW) map that could be due to OW flooding. • The overall flood risk from surface water flooding is considered to be moderate. • There are areas within the Scheme, around the Northern Loop, that have potential for groundwater flooding to occur at the surface. However, after implementing mitigation measures (see paragraphs below) groundwater flood risk is considered to be low. • There is low risk of flooding from water-retaining infrastructure.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	commercial to residential), where they could be affected by sources of flooding other than rivers or seas (for example, surface water drains, reservoirs)	<ul style="list-style-type: none"> Flood risk from sewers and artificial drainage systems to the Scheme is low.
5.123	The Flood Risk Assessment should identify and assess the risks of all forms of flooding and coastal erosion to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	<p>Appendix 13.6, Flood Risk Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) demonstrates that the Scheme will not increase flood risk elsewhere and is appropriately flood resilient to increases in rainfall intensity as a result of Climate Change. It will remain operational and safe for users in times of flood.</p> <p>Climate change has been considered as part of the assessment, with the 0.1% (1 in 1000) Annual Exceedance Probability (AEP) event flood extents from surface water flood mapping used as part of the assessment. It is considered likely that the 0.1% (1 in 1000) AEP flood extents give a reasonable approximation of potential future 1% (1 in 100) AEP extents in a credible maximum climate change scenario.</p>
5.124	<p>In preparing the Flood Risk Assessment, the applicant should:</p> <ul style="list-style-type: none"> consider the risk of all forms of flooding arising from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed, and where relevant, mitigated, so that the development remains safe throughout its lifetime take the impacts of climate change into account, clearly stating the development 	<p>A Flood Risk Assessment has been undertaken and can be found at Appendix 13.6 of the Environmental Statement Appendices (TR010064/APP/6.3) and the conclusions summarised in Chapter 13, Road Drainage and the Water Environment of the Environmental Statement (TR010064/APP/6.1). The main finding of the assessment are:</p> <ul style="list-style-type: none"> The Scheme is located within Flood Zone 1 and therefore at low risk of flooding from Main Rivers. The overall flood risk from OW Watercourses to the Scheme is considered to be moderate due to the areas of surface water flood risk shown on the Risk of Flooding from Surface Water) map that could be due to OW flooding. The overall flood risk from surface water flooding is considered to be moderate. There are areas within the Scheme, around the Northern Loop, that have potential for groundwater flooding to occur at the surface.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>lifetime over which the assessment has been made</p> <ul style="list-style-type: none"> • demonstrate how residual risks to and from reservoirs will be safely managed and mitigated • consider the vulnerability of those using the infrastructure including arrangements for safe access and escape • include the assessment of the remaining (known as residual) risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project • consider if there is a need to remain operational during a worst-case flood event over the development's lifetime • provide the rationale for the Secretary of State on application of the Sequential Test and Exception Test, as appropriate. 	<p>However, with mitigation measures in place the groundwater flood risk is considered to be low.</p> <ul style="list-style-type: none"> • There is low risk of flooding from water-retaining infrastructure. • Flood risk from sewers and artificial drainage systems to the Scheme is low. • Following the implementation of all the mitigation measures outlined in Chapter 13: Road drainage and the water environment of the Environmental Statement (TR010064/APP/6.1) it is anticipated that the residual risks on flooding are not significant, with the Scheme mitigating the effects from surface water flooding. <p>Climate change has been considered as part of the assessment, with the 0.1% (1 in 1000) AEP event flood extents from surface water flood mapping used as part of the assessment. It is considered likely that the 0.1% (1 in 1000) AEP flood extents give a reasonable approximation of potential future 1% (1 in 100) AEP extents in a credible maximum climate change scenario.</p>
5.125	<p>Applicants for projects which may be affected by, or may add to, flood risk should seek sufficiently early pre-application discussions, before the official pre-application stage of the NSIP process with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers and local highway authorities. Such discussions can be used to identify the likelihood and possible extent and nature of</p>	<p>Chapter 13, Road Drainage and Water Environment of the Environmental Statement (TR010064/APP/6.1) sets out the consultation that has been undertaken with the Environment Agency and BMBC as the Local Lead Flood Authority (LLFA) and how the Scheme design responds to this.</p> <p>Consultation and engagement with the Environment Agency have taken place during development of the Scheme. This has included engagement on technical matters such as flood risk, drainage and groundwater.</p> <p>A Statement of Common Ground is being developed with the Environment Agency to record the matters agreed between both parties and identify any matters which still need to be agreed. The Statement of Common Ground will be submitted to the Examining Authority during the course of the examination of the</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>the flood risk, to help scope the Flood Risk Assessment, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, before the application for development consent is submitted.</p>	<p>application for development consent. This document will detail the applications for consents and permits that will be made between the Applicant and the Environment Agency.</p> <p>A Statement of Common Ground with BMBC will also be submitted during the course of the examination of the application for development consent.</p> <p>The Consultation Report also sets out the engagement that has taken place with these organisations (TR010064/APP/5.1).</p>
5.126	<p>For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example, flow routes should be clearly identified and managed.</p>	<p>The drainage design has been developed taking into account future potential increases in flooding. In accordance with National Highways DMRB CG 501, a climate change allowance of 20% is applied together with a sensitivity test of 40% for uplifts to peak rainfall intensity. Latest Environment Agency guidance ('Flood risk assessments: climate change allowances (May 2022) states that a 30% uplift should be applied. Both climate change allowances (30% for design and 40% for sensitivity test) have been applied to the assessment of the drainage design for the 1-year return period event.</p> <p>The Scheme design has considered a variety of options for the mitigation of potential surface water drainage and flood risk impacts. The Scheme design consists of six separate road drainage catchments for road runoff (although note only four attenuation ponds and one treatment pond are required). Attenuation storage will be provided in the form of the attenuation ponds, swales, and oversized pipes depending on the site constraints. Where practicable, SuDS, flow conveyance and attenuation features (attenuation ponds, swales, filter drains, etc.) have been used to reduce the impact of surface water runoff being</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>discharged on the natural environment, thereby reducing flood risk and improving water quality.</p> <p>Where required, discharge rates during operation of the Scheme will be restricted to achieve the allowable discharge rates and ensure no increase in flood risk. The associated attenuation storage will be sized for the 1% (1 in 100) Annual Exceedance Probability storm event. This includes an allowance for climate change as described in Appendix 13.7, Drainage Strategy Report of the Environmental Statement Appendices (TR010064/APP/6.3).</p> <p>Where practicable, ponds are the preferred method of attenuation storage as they also provide a water quality treatment function. An additional permanent water depth of 0.3m is designed at the bottom of the attenuation ponds (below the attenuation pond outlet pipe invert level) to create a permanently wet pond. This will provide water quality treatment and biodiversity benefits. SuDS drainage will have a service life of 60 years and sufficient capacity to accommodate additional runoff associated with an increase in rainfall intensity due to climate change of 30%. However, there will be no increase in discharge rate from the SuDS as the additional runoff will be managed through the implementation of attenuation solutions, coupled with flow controls within all drainage networks.</p> <p>An additional permanent water depth of 0.3m is to be designed at the bottom of the attenuation ponds to create a permanently wet pond. This will provide water quality treatment and biodiversity benefits.</p>
5.127	Proposals should prioritise the use of sustainable drainage systems unless there is clear evidence that this would be inappropriate. A drainage strategy should be produced and submitted as part of the Flood Risk Assessment.	As described in Appendix 13.7, Drainage Strategy Report of the Environmental Statement Appendices (TR010064/APP/6.3), the Scheme design has considered a variety of options for the mitigation of potential surface water drainage and flood risk impacts. Where practicable, sustainable drainage systems (“SuDS”), flow conveyance and attenuation features (attenuation ponds, swales, filter drains, etc.) have been used to reduce the impact of surface water runoff being discharged on the natural environment, thereby reducing flood risk and improving water quality.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>SuDS drainage will have a service life of 60 years and sufficient capacity to accommodate additional runoff associated with an increase in rainfall intensity due to climate change of 30%. There will be no increase in discharge rate from the SuDS as the additional runoff will be managed through the implementation of attenuation solutions, coupled with flow controls within all drainage networks.</p> <p>All SuDS and drainage networks will be fully maintained and managed as per standard National Highways guidance and practice in accordance with the SuDS Manual C753 (Construction Industry Research and Information Association ((CIRIA), 2015a).</p>
<i>The Sequential Test</i>		
5.128	<p>Preference should be given to locating projects in areas of the lowest flood risk. The Secretary of State should not consent development in flood risk areas (including flood zones 2 and 3 and locations at risk of flooding from local watercourses, surface water, groundwater or reservoirs) accounting for the predicted impacts of climate change unless they are satisfied that the sequential test requirements have been met. The Secretary of State should not consent development in Flood Zone 3 unless they are satisfied that the Sequential and Exception Test requirements have been met. All projects should apply the sequential approach to locating developments within the site.</p>	<p>The Order Limits are wholly within Flood Zone 1, which is a low risk of flooding. Appendix 13.6, Flood Risk Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) demonstrates that the Sequential Test is met.</p>
<i>The Exception Test</i>		

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.129	<p>If, following application of the Sequential Test, it is not possible, consistent with the wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3a, the Exception Test can be applied. Flood Zone 3a applies when land has a 1 in 100 greater annual probability of river flooding. The Exception Test provides a method of managing flood risk while still allowing necessary development to occur.</p>	<p>The Order Limits are wholly within Flood Zone 1, which is a low risk of flooding. Appendix 13.6, Flood Risk Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) concludes that the Exceptions Test does not therefore apply.</p>
5.130 – 5.131	<p>The Exception Test should only be applied once the Sequential Test has been satisfactorily applied.</p> <p>Both elements of the test will have to be passed for development to be consented. For the Exception Test to be passed:</p> <ul style="list-style-type: none"> • it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk • a Flood Risk Assessment must demonstrate that the project will be safe for its lifetime, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. 	<p>See the response to draft NPS NN paragraph 5.129.</p>
5.132	<p>In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and constructed to remain operational and safe for users in times of</p>	<p>See the response to draft NPS NN paragraph 5.128.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	flood; and any project in Flood Zone 3b should result in no net loss of floodplain storage and not impede water flows.	
<i>Mitigation</i>		
5.133	To satisfactorily manage flood risk and the impact of natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of Sustainable Drainage Systems, but could also include vegetation to help slow runoff, hold back peak flows and make landscapes more able to absorb the impact of severe weather events.	All the documents that form the Environmental Statement (TR010064/APP/6.1) and the associated appendices (TR010064/APP/6.3), including the Flood Risk Assessment and Drainage Strategy, will become certified documents if the draft DCO (TR010064/APP/3.1) is granted by the Secretary of State. This will mean that the Applicant must comply with all the requirements of the Environmental Statement.
5.134	Site layout and surface water drainage systems should cope with events the exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	See the response to draft NPS NN paragraph 5.126.
5.135	The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project unless specific off-site arrangements are made and result in the same net effect.	During operation, the Scheme will result in an increase in impermeable area due to the additional carriageway. Runoff from such areas will drain to five new attenuation ponds that would restrict outflows to rates that do not increase flood risk. Appendix 13.7, the Drainage Strategy Report and Appendix 13.2 the Water Quality Assessment Report of the Environmental Statement Appendices

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		(TR010064/APP/6.3) set out the treatment train specifications for drainage catchment within the extent of the Scheme.
5.136	If there are no viable Sustainable Drainage Systems options available, it may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside of the project site, if necessary, through the use of a planning obligation.	SuDS is provided as set out in response to draft NPS NN paragraph 5.126.
5.137	The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located in parts of the site with lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken forward to lower flood risk by improving flow routes, flood storage capacity and using Sustainable Drainage Systems.	See the response to draft NPS NN paragraph 5.128 relating to the Sequential Test. No new open space is provided as part of the Scheme. See the response to draft NPS NN paragraph 5.126 with respect to SUDS.
<i>Decision making</i>		
5.138	Where flood risk is a factor in determining an application for development consent, the	See the response to draft NPS NN paragraph 5.128.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>Secretary of State should be satisfied that, where relevant:</p> <ul style="list-style-type: none"> the application is supported by an appropriate Flood Risk Assessment the Sequential Test has been satisfactorily applied as part of the site selection and, if required, the Exception Test. 	
5.139	<p>When determining an application, the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider development appropriate in areas at risk of flooding where (informed by a Flood Risk Assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that:</p> <ul style="list-style-type: none"> within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of Sustainable Drainage Systems. 	See the response to draft NPS NN paragraph 5.128.

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5.140	<p>The term Sustainable Drainage Systems is taken to cover the whole range of sustainable approaches to surface water drainage management including:</p> <ul style="list-style-type: none"> • source control measures including rainwater recycling and drainage • use of Sustainable Drainage Systems Management Trains to improve water quality • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities • filter strips and swales, which are vegetated features to hold and drain water downhill mimicking natural drainage patterns • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed • basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding 	See the response to draft NPS NN paragraph 5.126.
5.141	For construction work which has drainage implications approval for the project's drainage system will form part of the	The Applicant will be responsible for maintaining SUDs drainage.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with Technical Standards published by Ministers. In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems, including any necessary access rights to property. Sustainable Drainage Systems should deliver multifunctional benefits and help to achieve Biodiversity net gain. The Secretary of State should be satisfied that the most appropriate body is being given responsibility for maintaining any Sustainable Drainage Systems, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority and the relevant Sustainable Drainage Systems Approval Body or another body such as the Internal Drainage Board. Where infiltration type Sustainable Drainage Systems are proposed, pre-applications with the Environment Agency are recommended to ensure that they do not cause pollution to surface and groundwater quality and applicants should consider the role of Sustainable Drainage Systems management trains to control and treat run-off.</p>	<p>The impact of the Scheme on the Water Framework Directive (WFD) has been assessed under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.</p> <p>Measures to minimise the risk of pollution to the water environment are set out below:</p> <ul style="list-style-type: none"> • The Applicant’s Highways England Water Risk Assessment Tool (HEWRAT) assessments have been undertaken at each design iteration with the results of the assessments informing the need and extent of further mitigation. This has then been incorporated into subsequent design iterations. • Appendix 13.1, WFD Compliance Assessment, Appendix 13.2 the Water Quality Assessment Report and Appendix 13.7, the Drainage Strategy Report of the Environmental Statement Appendices (TR010064/APP/6.3) set out and assess the treatment train specifications for drainage catchment within the Order Limits. • Sediment forebays are to be provided at the inlet of all attenuation ponds which will provide effective pre-treatment (removal of coarse sediments) and ensure ease of maintenance during the removal of any such collected coarse sediments. The main storage compartment, after the sediment forebay, for all of the attenuation ponds will be a 0.3m depth permanent water pool which will act as the main surface water treatment zone. Where required the attenuation ponds can also be cascaded (contain multiple storage compartments) to increase the residence time and enable the additional sedimentation of particulate matter to occur. In addition, attenuation ponds will be planted with vegetation sufficiently robust to withstand the potential pollutants suspended in the surface water runoff which will provide additional water quality treatment benefits. Perennial ryegrass and fescues are typical for this purpose.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<ul style="list-style-type: none"> • The vegetation in swales / vegetated ditches will slow the surface water flow rate provided the flow is at or below the level of the vegetation. This will increase water residence time in the swale and force sediments and other potential pollutants to settle out. Check dams can also be provided to maximise the level of treatment. Check dam provision will be assessed at the detailed design stage. Where feasible swales / vegetated ditches are provided from some attenuation ponds (where practicable) as an added level of treatment prior to the surface water discharging to the receiving watercourse. • Filter drains will filter out some fine sediments, metals, hydrocarbons and other pollutants as the surface water percolates down through the trench fill material overlying the perforated filter drain. Silt traps in chambers and gullies will provide suspended particulate matter retention with regular maintenance. • Appendix 13.2: the Water Quality Assessment Report of the Environmental Statement Appendices (TR10064/APP/6.3) also includes an assessment of spillage risk. This assessment has concluded that the risk of a serious chemical spillage from all road catchments is low. Isolation chambers fitted with penstock valves will be located at the downstream end of the proposed highway drainage systems. This will allow isolation of the pollutants within the highway drainage system thereby avoiding pollution to receiving watercourses. • In terms of managing the risk of surface and groundwater pollution during construction, Appendix H, Outline Surface and Groundwater Management Plan, is contained in the First Iteration EMP (TR010064/APP/6.5). This will be developed into a Second Iteration EMP to be implemented during construction and secured by Requirement 4 of the draft DCO (TR010064/APP/3.1). • The Environment Agency does not require the Applicant to apply for consent for normal routine maintenance operations.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		Also see the response in draft NPS NN paragraph 5.247 with respect to maintaining compliance with water quality standards.
5.142	If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not do so that all reasonable steps have been taken by the applicant and the Environment Agency to try and resolve the concerns.	See the response to draft NPS NN paragraph 5.125.
5.143	<p>The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure means that there will be case where:</p> <ul style="list-style-type: none"> • upgrades are made to existing infrastructure in an area at risk of flooding • infrastructure in a flood risk area being replaced • infrastructure is being provided to serve a flood risk area • infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area. 	This is covered in the response to paragraph 5.122.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.144	The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area while also offering opportunities to enhance biodiversity. It should be demonstrated that there is no increase in flood risk elsewhere. In such cases the Secretary of State should take account of any positive benefits to placing linear infrastructure in a flood risk area.	<p>Within the Order Limits new areas of wet woodland, that are typical to the area, will be created. The wet woodland will be located in low points within the Scheme, typically below embankments. This will help retain surface water as well as improving the biodiversity of the area.</p> <p>Appendix 13.6, Flood Risk Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) assesses the impact to and from the Scheme on all sources of flood risk and commits to mitigation to manage flood risk. This concludes that the Scheme will be acceptable and not result in unacceptable levels of flooding or increase flooding elsewhere.</p>
5.145	Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation measures to have been made, to ensure that infrastructure remains functional in the event of predicted flooding.	See the response to paragraph 5.136.
Land contamination and instability		
<i>Applicant's assessment</i>		
5.148	Where necessary, land contamination and stability should be considered in respect of new development. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land contamination and instability. If land stability could be an issue, applicants should seek appropriate and technical and environmental expert advice from a competent person to assess the likely	<p>Ground Investigation surveys have been completed in July 2023 and the outcome can be found in the Geotechnical Investigation Report at Appendix 9.3 of the Environmental Statement Appendices (TR010064/APP/6.3). This has informed Chapter 9 Geology and Soils of the Environmental Statement (TR010064/APP/6.1) which confirms the following:</p> <ul style="list-style-type: none"> Where low strength soils are present underlying the Scheme footprint, these may potentially have an impact on slope stability. Consideration will be made at detailed design stage to mitigate any stability risks

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority, Environment Agency and Local Authority, if necessary.</p>	<p>associated with earthworks slopes and is likely to include the need for ground improvement techniques.</p> <ul style="list-style-type: none"> The earthwork design will consider the findings of the ground investigation as set out in Appendix 9.3 Geotechnical Investigation Report of the Environmental Statement Appendices (TR010064/APP/6.3) to determine appropriate slope gradients considering the geology, hydrogeology, pore pressure ratio, earthwork height, available land take boundary and all the constraints including but not limited to the requirements for; Vehicle Restraint Systems (VRS), drainage and maintenance access. <p>Mitigation in relation to ground stability will be documented in an Geotechnical Design Report which will be produced during the detailed design stage.</p>
5.149	<p>For developments on previously developed land, applicants should ensure and demonstrate they have considered the risk posed by land contamination, through engagement in pre-application discussions, and how it is proposed to address these. A preliminary assessment for land and groundwater contamination to determine the rendition and mitigation needed under Land Contamination Risk Management. A preliminary assessment of land contamination and ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. Applicants should ensure that any necessary investigations are undertaken to ascertain that their sites are, and will, remain stable or can be made so as part of the development.</p>	<p>Chapter 9, Geology and Soils of the Environmental Statement (TR010064/APP/6.3) assesses the potential for contamination as:</p> <ul style="list-style-type: none"> The risk to construction workers associated with asbestos has been assessed as Moderate. The risk to adjacent residents and land users has been assessed as Moderate/Low. The risk will need to be mitigated through the development of working methods and risk assessments in accordance with the Control of Asbestos Regulations (CAR) 2012 (Health and Safety Executive). The potential impact on controlled waters from soil leachate and groundwater contaminant exceedances is not considered significant. The risk to Secondary aquifers in the superficial deposits, and surface water bodies, associated with elevated soil leachate, has been assessed as Moderate/Low,

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.</p>	<ul style="list-style-type: none"> • The risk to the Secondary A and Principal aquifers in bedrock (Pennine Coal Measures and Chester Formation, respectively) has been assessed as Low. • The risk to surface water bodies, associated with elevated groundwater contaminants in the Made Ground and superficial deposits, has been assessed as Moderate/Low. • The risk to bedrock aquifers has been assessed as Low. • The risk to licensed groundwater abstractions, associated with elevated groundwater contaminants in the Made Ground and superficial deposits, has been assessed as Moderate/Low. It does not warrant any remediation. <p>Any asbestos contaminated soils will have been removed during construction, therefore exposure of maintenance workers and adjacent residents / land users to asbestos during operation is unlikely to occur. As such, the operational impact on human health from asbestos has been scoped out of further assessment.</p> <p>Based on the findings of the controlled waters risk assessment, the operational impacts on groundwater and surface water have been scoped out of further assessment.</p> <p>Consultation with the Environment Agency, Natural England, the Coal Authority and BMBCI has been undertaken as outlined in Chapter 4: Environmental Assessment Methodology and Chapter 9 Geology and Soils of the Environmental Statement (TR010064/APP/6.1). The methodology for the geology and soils assessment complies with the requirements set out in the relevant technical standards:</p>
<p><i>Mitigation</i></p>		

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.150	<p>Applicants have a range of mechanisms available to mitigate and minimise the risk of land instability. These include:</p> <ul style="list-style-type: none"> • establishing the principle and layout of new development, for example avoiding mine entries and other hazards • ensuring proper design of structures to cope with movement expected, and other hazards such as mine and / or ground gases • requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource 	<p>Appendix G, Outline Materials Management Plan and Appendix J, Outline of Contaminated Land Management Plan of the First Iteration EMP (TR010064/APP/6.5) outlines the management of soils including the completion of a soil resource survey prior to construction and stripping of top soil for re-use.</p> <p>Land Stability has been considered by NPS NN paragraph 5.149 above.</p>
5.151	Applicants should submit a coal mining risk assessment as part of their application in specific Development High Risk areas.	Coal Authority Coal Mining Reports have been referenced in Chapter 9, Geology and Soils of the ES (TR010064/APP/6.1). The Order Limit of the Scheme is not within a Development High Risk Area.
Landscape and visual impacts		
<i>Applicant's assessment</i>		
5.153	The applicant should carry out a landscape and visual impact assessment. A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment for the proposed project should include the impacts	As part of the Environmental Impact Assessment (EIA), a Landscape and Visual Impact Assessment (LVIA) has been undertaken for the construction and operational phases (year 1 (2029) and year 15 (2044)) of the Scheme as reported in Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP/6.1). The assessment has followed the standards set out in

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>during construction and operation, and reference to any operational landscape character assessment and associated studies. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England. For seascapes, applicants should consult the Seascape Character Assessment and the Marine Plan Seascape Character Assessments, and any successors to them.</p>	<p>National Highways DMRB LA 104 Environmental Assessment and Monitoring and National Highways DMRB LA 107 Landscape and Visual Effects.</p> <p>The chapter refers to the current local landscape character assessment (the Greater Manchester Landscape Character and Sensitivity Assessment (2018)).</p> <p>An assessment of townscape effects has been made on townscape areas defined by the competent expert for landscape and visual assessment following the Landscape Institute's 'Townscape Character Assessment Technical Information Note 05/2017'.</p>
5.154	<p>The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of a project, potential impacts on views (including protected views) and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation. The assessment should also demonstrate how noise and light pollution from construction and operational activities on residential amenity and on sensitive locations, receptors, and views will be minimised.</p>	<p>Chapter 7: Landscape and Visual of the Environmental Statement (TR010064/APP/6.1) provides a LVIA) considers the likely significant visual effects during both construction and operation (year 1 (2029) and year 15 (2044)). Effects on aesthetic and perceptual qualities from light pollution, including effects on local amenity and tranquillity, are acknowledged within the assessment of landscape and visual effects.</p> <p>Chapter 11: Noise and Vibration of the Environmental Statement (TR010064/APP/6.1) separately assess the effects of noise.</p>
5.155	<p>Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in England's National Parks and the Broads, or Area of Outstanding Natural Beauty, would need to comply with the respective duties in section 11A of the</p>	<p>As stated in Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP6.1) there are no nationally designated National Parks or National Landscapes (formerly known as Areas of Outstanding Natural Beauty (AONBs)) within 5km of the Scheme and the Scheme will have no impact on such areas.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>National Parks and Access Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000. The policy paper titled English national parks and the broads: UK government vision and circular 2010 states that major development in or adjacent to the boundary of a National Park, Area of Outstanding Natural Beauty or the Broads, can have a significant impact on the qualities for which they were designated. Government planning policy advises that major development should not take place within them apart from exceptional circumstances. For significant road widening or the building of new roads or railways in England's National Parks and the Broads or Area of Outstanding Natural Beauty, applicants also need to fulfil requirements set out in circular 2010 or successor documents. Management Plans should also be considered for National Parks and Area of Outstanding Natural Beauty, especially on identified special qualities of an area and any proposals for enhancement.</p>	
<i>Mitigation</i>		
5.156 – 5.157	<p>The scale of a project should be minimised to avoid or mitigate the visual and landscape effects, during construction and operation, so far as possible while maintaining the operational requirements of the scheme. In exceptional circumstances a reduction in</p>	<p>Chapter 3, Assessment of Alternatives of the Environmental Statement (TR010064/APP/6.1), describes the process of changes to the highway design and benefits of change to the design.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>operational requirements might be warranted, and the Secretary of State may decide that the benefits to reduce the landscape effects outweigh the marginal loss of scale or function.</p> <p>Projects need to be designed carefully, taking account of the potential impact on the landscape.</p>	<p>Figure 2.3, the Environmental Masterplan in the Environmental Statement Figures (TR010064/APP/6.2) indicates mitigation measures to address adverse effects from a combination of environmental topics.</p>
5.158	<p>Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and topographical interventions (for example, creation of bunds or lowering of ground level). Also, landscaping schemes (including screening options and design elements that soften the built form such as green or brown roofs, or living walls), depending on the size and type of the proposed project. Materials and designs for infrastructure should always be given careful consideration in terms of environmental standards.</p>	<p>To avoid, reduce or remediate (offset) potential effects on the landscape, mitigation and enhancement measures have been developed as presented within Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP/6.2).</p> <p>Further design considerations and landscape objectives have been defined as part of an overarching set of scheme-specific design principles presented within Chapter 2, the Scheme of the Environmental Statement (TR010064/APP/6.1) and the Scheme Design Report (TR010064/APP/7.6). These have been used to inform development of the Scheme design, including both the highway alignment and Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2).</p>
5.159	<p>Depending on the topography of the surrounding terrain and areas of population, it may be appropriate to undertake landscaping off-site, although if such landscaping was proposed to be consented by the Development Consent Order, it would have to be included in the order limits for that application. For example, filling in gaps in existing tree and hedge lines would</p>	<p>All landscape mitigation, presented within Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP/6.1), is incorporated within the extents of the Order Limits and no off-site landscaping is required.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	mitigate the impact when viewed from a more distant vista.	
5.160	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality and can reinforce or enhance landscape features and character	Design considerations and landscape objectives have been defined as part of an overarching set of scheme-specific design principles presented within Chapter 2, the Scheme of the Environmental Statement (TR010064/APP/6.1). These have been used to inform development of the Scheme design, including both the highway alignment and mitigation outlined on Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2).
<i>Decision making</i>		
<i>Landscape impact</i>		
5.161	Landscape effects of a project depend on the existing character of the local landscape, its capacity to accommodate change and nature of effect likely to occur. All of these factors need to be considered in judging the impact of a project on landscape. Projects need to have regard to siting, orientation, height operational and other relevant constraints. The aim should be to avoid or minimise harm to the landscape, providing reasonable mitigation and opportunities for enhancement where possible and appropriate.	<p>Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) shows the mitigation measures to address adverse effects from a combination of environmental topics. Design work has been undertaken to improve biodiversity, and also to integrate the Scheme into the landscape, and reduce the effects on people's views, which is described in Chapter 7 Landscape and Visual of the Environmental Statement (TR010064/APP/6.1). Measures to reduce these effects are contained within the REAC and also in Appendix N, the Outline Landscape and Ecology Management Plan of the First Iteration EMP (TR010064/APP/6.5).</p> <p>Following the principles of The Road to Good Design (Highways England, 2018) Scheme scale, design and materials have been applied in the following way (further details are included in the Scheme Design Report (TR010064/APP/7.6):</p> <ul style="list-style-type: none"> The Simister Pike Fold Viaduct and Simister Pike Fold Bridge are prominent new structures and have been subject to a design process aimed at providing structures that acknowledge the potential impacts on the wider landscape. A combination of concrete and weathering steel will be implemented for the bridge spans. The combination of weathering

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>steel and planting along the structure embankments will be visually attractive and will help to physically integrate the structures into the landscape.</p> <ul style="list-style-type: none"> • The existing raised earth mound in the north-east quadrant has been used in the configuration of the Simister Pike Fold Viaduct and Simister Pike Fold Bridge embankments and Northern Loop to limit landscape change the Special Landscape Area. • New embankments required for the Northern Loop are designed with a shallower gradient than typical highway embankments, and the landscape design developed to further help integrate the road into the 'pattern' of the Special Landscape Area. • Existing linear tree belts necessitating removal for carriageway widening will be reinstated with a higher percentage of feathered trees and some standard trees to improve visual screening in the early years. • Tree and shrub species would provide similar or improved habitat type to that removed. Species shall be native, or non-native in certain focus locations, and of a similar or improved species mix, overseen by competent expert ecologists and arboriculturists. • The attenuation ponds have been shaped for optimum attenuation and flow, and fit within their urban fringe context, whilst providing greater opportunities for habitat creation including wetland habitat
<i>Development proposed within nationally designated landscapes</i>		
5.162	England's National Parks, the Broads and Areas of Outstanding Natural Beauty have been confirmed by the government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific	As stated in Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP6.1) there are no nationally designated National Parks or National Landscapes (formerly known as Areas of Outstanding Natural Beauty (AONBs)) within 5km of the Scheme and the Scheme will have no impact on such areas.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>statutory purposes which helps to ensure their continued protection and which the Secretary of State should have regard to in their decisions. The conservation and enhancement of the natural beauty of the landscape of the natural beauty of the landscape and countryside should be given great weight by the Secretary of State in deciding on applications for development consent in these areas.</p>	
<p><i>Developments in locally important landscape areas</i></p>		
<p>5.167</p>	<p>Outside nationally designated landscapes, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development plan in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in and of themselves as reasons to refuse consent, as this may unduly restrict acceptable development.</p>	<p>The Bury Unitary Development Plan includes Policy EN9/1 Special Landscape Area. The Scheme is within the Special Landscape Area where it extends north-eastwards from M60 Junction 18. The Special Landscape Area is within LCA 26: Prettywood, Pilsworth and Unsworth Moss.</p> <p>Particular attention has been given to avoid, reduce or remediate (offset) potential effects on the Special Landscape Area, for example the Northern Loop eastern embankment will be designed with a shallower gradient within the Special Landscape Area. Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2) sets out this mitigation. The landscape design has also been developed to reduce the visibility of the Scheme and the existing motorway infrastructure within the Special Landscape Area.</p>
<p>5.168</p>	<p>Within areas defined as Heritage Coast that are not already within one of the nationally designated landscape areas, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is</p>	<p>The Scheme is inland and does not impact on the coast.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	unlikely to be appropriate unless it is compatible with its special character.	
5.169	In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including any appropriate mitigation.	<p>Chapter 7, Landscape and Visual and Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) provides a full assessment of the effects of the construction and operation of the Scheme on landscape character, visual amenity, wildlife and the habitats they rely upon. The chapters detail the embedded and essential mitigation required to offset impacts. These measures will be secured through the First Iteration EMP (TR010064/APP/6.5) and incorporated into working practices. The EMP contains a REAC.</p> <p>The construction of the Scheme will result in impacts on landscape features, including some biodiversity losses; these losses have been offset by essential environmental mitigation as shown in Figure 2.3, Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2). The Scheme, , achieves a net gain in biodiversity.</p> <p>An Arboricultural Impact Assessment (AIA) has been undertaken and is included in Appendix 7.5, Arboricultural Impact Assessment of the Environmental Statement Appendices (TR010064/APP/6.3). An iterative process has been undertaken to refine the Scheme to avoid tree loss where possible. The AIA covers trees and woodland that could be affected by the Scheme.</p> <p>Figure 7.5.1, Tree Constraints Plan and Figure 7.5.2, Tree Removal Plan, Annex A of Appendix 7.5 of the Environmental Statement Appendices (TR010064/APP/6.3) show the locations of trees within the application boundary, and those currently at risk of removal. Commitment LV3 in the REAC, contained within the First Iteration EMP (TR010064/APP/6.5)) will minimise loss of trees and woodland. The commitment will be implemented through the preparation of an Arboricultural Method Statement (AMS).</p>
<i>Visual Impacts</i>		
5.170	The Secretary of State will have to judge whether the visual effects on sensitive	Chapter 7, Landscape and Visual of the Environmental Statement (TR010064/APP/6.1) has identified that there will be impacts on views during

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	<p>receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast. Within areas defined as Heritage Coast, planning policies and decisions should be consistent with the special character of the area and the importance of its conservation.</p>	<p>construction and operation of the Scheme. However, impacts will reduce once construction is complete and will continue to reduce as mitigation planting establishes. The assessment shows that there will be no residual significant visual effects by year 15, (2044) with the exception of one location in the vicinity of M60 Junction 17 where it has not been possible to reinstate tall vegetation adjoining the M60 boundary on Warwick Close due to the easements for utilities and the narrow width of the M60 verge. Whilst vegetation will be replaced, this will not grow as tall as the vegetation that will be removed. There will be beneficial effects (improvements on existing views) in some locations around M60 Junction 18.</p> <p>A series of visualisations, shown in Figure 7.7: Photomontages of the Environmental Statement Figures (TR010064/APP/6.2), have been developed, including for the Northern Loop, which have modelled the Scheme and mitigation planting at year 1 and year 15. The heights of the modelled trees and shrubs are based on experience from other road schemes and are described in detail in Appendix 7.1, Landscape and Visual Impact Assessment methodology of the Environmental Statement Appendices (TR010064/APP/6.3).</p>
<p>Land use, including Open Space, Green Infrastructure and Green Belt</p>		
<p><i>Applicant's assessment</i></p>		
<p>5.176</p>	<p>Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity, quality and functionality in a suitable and accessible location. Applicants considering proposals which would involve developing such land should have regard to any local authority's</p>	<p>This is considered by Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1).</p> <p>Whitefield Golf Course, Prestwich Forest Park and Philips Park are large areas of greenspace to the west of the Order Limits. Prestwich Forest Park encompasses Philips Park and comprises woodland, scrub and some amenity grass areas. It is an important area for outdoor recreation, including mountain biking.</p> <p>Pike Fold Golf Course is within the Order Limits. To the south-east of the Order limits, there is Heaton Park which covers over 240ha.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>assessment of need for such types of land and buildings.</p>	<p>Education facilities with playing fields include St Margarets Church of England Primary School and Unsworth academy.</p> <p>Prestwich Heys Football Club is located to the south of the Order Limit.</p> <p>There will be no impacts on Prestwich Forest Park, Philips Park and Whitefield Golf Club from the Scheme.</p> <p>To accommodate the Scheme, part of the Pike Fold Golf Course will need to be reconfigured to maintain an 18-hole course. The Scheme does not require any permanent acquisition of land from the Golf Club and work to redesign and implement changes will be undertaken separately by the Golf Course. Within the Order Limits, the Scheme will carry out relatively minor earthworks, drainage and landscaping within the area occupied by the Golf Course. Discussions have taken place with Pike Fold Golf Club as referenced in the Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes (TR010064/APP/5.2).</p> <p>Prestwich Heys Football Club is located to the south of the Order Limits. No impact on the ability to use the pitches at Prestwich Heys Football Club is anticipated. The Register of Environmental Commitments in the First Iteration EMP (TR010064/APP/6.5) includes measures to ensure access is maintained during construction.</p> <p>Education facilities with playing fields include St Margarets Church of England Primary School and Unsworth academy. Temporary possession of an area of approximately 2ha which falls between two pitches on Unsworth Academy playing fields will be required to facilitate drainage improvement works. Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1) states that approximately 6% (0.3ha) of playing fields area is to be used to allow for drainage works and a permanent right of access will be in place. The land take will be in the form of one strip of land along the southern boundary of the field. No physical impact is anticipated on the marked pitches themselves and therefore the sports function of the playing fields will be generally maintained. Discussions that have taken place with Unsworth</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>Academy are referenced in the Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes (TR010064/APP/5.2).</p> <p>Access to Simister Allotments and Eden Garden Allotments will be maintained throughout.</p>
5.177	<p>The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within and established Green Belt and, if so, whether their proposal may be considered inappropriate development within the meaning of Green Belt planning policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances.</p>	<p>The Case for the Scheme (TR010064/APP/7.1) identifies that approximately 67.8 hectares of the Order Limit is currently within the Green Belt.</p> <p>Policy OL1 (Green Belt) of the Bury UDP delineates the Green Belt boundary. The land surrounding M60 Junction 18 is in the Green Belt. The emerging Places for Everyone (“Pfe”) proposes to release land to the north east of M60 Junction 18 from the Green Belt for the Heywood/Pilsworth strategic allocation which is part of the Northern Gateway. The Northern Gateway comprises three different strategic allocations for housing and employment in Bury and Rochdale. However, until such time that Pfe is adopted, this land remains in the Green Belt and even if Pfe removes this land from the Green Belt, approximately 49 hectares of the Order Limit will remain in the Green Belt.</p> <p>The Case for the Scheme has provided an assessment of the Scheme against the purposes of Green Belt Policy, having regard to both National Policy Statements for National Networks and the National Planning Policy Framework (NPPF). This assessment has concluded that the Scheme is inappropriate development in the Green Belt and therefore very special circumstances (VSC) need to be demonstrated to justify development. This is referred to further in the response to draft NPS NN paragraph 5.195.</p>
5.178	<p>The applicant should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use of a neighbouring site from continuing. Applicants should also assess any effects of</p>	<p>The emerging Places for Everyone proposes to release land from the Green Belt for the Northern Gateway which comprises three different strategic allocations for housing and employment in Bury and Rochdale. Whilst part of the Order Limits will overlap with land allocated for the Northern Gateway, the Scheme will not compromise the delivery of this major strategic allocation.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	precluding a new development or use proposed in the development plan. The assessment should be proportionate.	It should be noted that the Northern Gateway will be directly accessed from the Local Road Network.
5.179	Linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land. The identification of a policy need for linear infrastructure will take account of the fact that there will be an impact on the Green Belt and, as far as possible, of the need to contribute to the achievements of objectives for the use of the land in Green Belts.	<p>As stated in response to draft NPS NN paragraph 5.177, part of the Order Limits is within the Green Belt. This is assessed further in NPS NN paragraph 5.195 below.</p> <p>The national need for the Scheme is identified within the Governments Regional Investment Strategy for 2020-25 and is included on the Applicant's website under the 2020-2025 Delivery Plan. Further details are also set out in the Funding Statement (TR010064/APP/4.2)</p> <p>The following saved policy of the Bury UPD also relates to improvements to the M60, although land to construct the Scheme is not specifically safeguarded:</p> <p><i>'HT2/9 - Highways Agency Road Schemes: The Highways Agency has identified a number of major highway schemes as part of the national trunk road programme. The following scheme has been identified within the Borough: HT2/9/1 - M60 improvement between Junctions 12 to 18'.</i></p>
5.180	Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil health and protect and improve soils, taking into account any mitigation measures proposed.	<p>Chapter 9, Geology and Soils of the Environmental Statement (TR010064/APP/6.1) provides an assessment of the likely significant effects of the Scheme with respect to soil resources (mostly agricultural).</p> <p>Agricultural land is present within the Order Limits. Agricultural land is graded using the Agricultural Land Classification (ALC) system. This system classifies land into five grades according to the extent to which physical or chemical characteristics impose long term limitations on the agricultural use of a site for food production. Within the Order Limits the land classification is:</p> <ul style="list-style-type: none"> • 0.4 hectares (0.5% of the Order Limits) of agricultural land is classified as Grade 2. • 4.5 hectares (5.3% of the Order Limits) is classified as Grade 3a. • 26.2 hectares (30.6% of the Order Limits) is classified as Grade 3b.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>Soil is an important natural capital resource, providing many essential services such as storing carbon (also known as a carbon sink), reducing the risk of flooding, providing wildlife habitats and delivering global food supplies. Guidance on sustainable soil management can be found in Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. As a first principle, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value (see paragraphs 5.146 to 5.151).</p>	<ul style="list-style-type: none"> • 2.2 hectares (2.6% of the Order Limit) is classified as grade 4. • Land that could not be surveyed is 4.1ha (4.8%) of the Order Limits. • Non-agricultural land is 48.3 hectares (56.4% of the Order Limits). • The total area of the Order Limits is 85.7 ha. <p>Most agricultural land and the associated agricultural land holdings are located on the land surrounding M60 Junction 18. Figure 9.3, Agricultural Land Classification and Figure 12.2, Agricultural Land Holdings of the Environmental Statement Figures (TR010064/APP/6.2) shows this land.</p> <p>It is anticipated that approximately 23.1 ha (27% of the Order Limits) of agricultural land, including 2.3 ha (2.7% of the Scheme area) of Best Most Versatile (BMV) land (this is land classified as Grade 2 and 3a) will be permanently developed or otherwise lost to agricultural production as a result of the Scheme. An additional 11.1 ha of agricultural land (no BMV land) is anticipated to be temporarily possessed for the Scheme but will be reinstated following completion.</p> <p>The permanent sealing or wastage of topsoil will be avoided as far as practicable via stripping and sustainable reuse elsewhere. In addition, by following best practice soil management measures, degradation during stripping, handling and storage will either be avoided or will only be temporary in nature. Measures to ensure the sustainable use of soils are highlighted in Chapter 9, Geology and Soils of the Environmental Statement (TR010064/APP/6.1). An Outline Materials Management Plan at Appendix G and an Outline Contaminated Land Management Plan at Appendix J of the First Iteration EMP (TR010064/APP/6.5) outlines the management of soils including the completion of a soil resource survey prior to construction and stripping of top soil for re-use. The Outline Management Plans will be developed into the Materials Management Plan and Contaminated Land Management Plan as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1)</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.181	<p>The Agricultural Land Classification is the only approved system for grading agricultural quality in England and Wales. If necessary, field surveys should be used to establish the Agricultural Land Classification grades in accordance with the current grading criteria, or any successor to it and identify the soil types to inform soil management at the construction, operation and decommissioning phases in line with the Defra Construction Code. Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This is to be in line with the ambition set out in the 25 Year Environmental Plan to manage all of England's soils sustainably by 2030.</p>	<p>Appendix 9.2, Agricultural Land Classification Survey Report is provided as part of the Environmental Statement Appendices (TR010064/APP/6.3).</p> <p>For construction, Appendix F, Outline Soil Management Plan and Appendix J Outline Contaminated Land Management are provided in the First Iteration of the EMP (TR010064/APP/6.5).</p>
5.182	<p>The applicant should engage in pre-application discussions with the local planning authority and other regulatory bodies at the earliest opportunity. It is essential that engagement is meaningful and supported where necessary by Statements of Common Ground. Discussions will cover a range of potential local impacts and issues, and the local planning authority should identify any concerns it has about impacts of the application on land-use,</p>	<p>The Consultation Report (TR010064/APP/5.1) presents the Scheme approach to pre-application engagement with stakeholders, the community and regulatory bodies.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>having regard to the development plan and relevant applications. This includes, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which is submitted during examination and after an application for development consent has been accepted.</p>	
5.183	<p>Applicants should safeguard any mineral resources on the proposed site as far as possible. Taking into account the policies of the Minerals Planning Authority, applicants should consider whether prior extraction of the minerals would be appropriate.</p>	<p>This is considered by Chapter 10, Material Assets and Waste of the Environmental Statement (TR010064/APP/6.1).</p> <p>The construction of the Scheme requires land to be permanently acquired and used outside the existing highway boundary which could result in the partial sterilisation of Mineral Safeguarding Areas (MSA) and superficial peaty soils / horizons.</p> <p>Notwithstanding this, both mineral safeguarding sites and peat resources have been scoped out of this assessment on the basis that they are not resources that could be worked / extracted as confirmed by the Scoping Opinion (TR010064/APP/6.7).</p> <p>Where reasonably practicable, the Scheme has reduced the unnecessary sterilisation of MSAs, and there are no mineral safeguarding sites nor peat resources within the Order Limits.</p>
<i>Mitigation</i>		
5.184	<p>Applicants can avoid, or minimise, the direct effects of a project on the existing use of the proposed site or proposed uses near the site, by the application of good design principles, including the layout of the project</p>	<p>See the response to paragraph 5.185 below.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	and the protection of soils during construction.	
5.185	Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impacts. Applicants should endeavour to improve networks and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of ways.	<p>This is considered by Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1) which describes effects on WCH including mitigation.</p> <p>Effects on WCH during operation have been assessed as not significant. The Scheme includes a modest enhancement for recreational walkers through the inclusion of a new route through an area of ecological mitigation. It will not cause any severance of existing routes for walkers, cyclists and horse riders. There will be some temporary effects on PROW experienced during construction, although appropriate diversion routes will be provided.</p> <p>The Streets, Rights of Way and Access Plans (TR010060/APP/2.5) show how PROWs, permissive paths, local roads and private means of access will be maintained. This is also shown on Figure 2.2 the Scheme Design and Figure 2.3 the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2), which show all the key environmental constraints and features including where PROW will be extinguished and replaced.</p>
5.186	The Secretary of State should also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of planning obligations, for example, to provide and exchange of land between two owners and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided	There is no permanent loss of any open space or recreational land which would mean sections 131 and 132 of the 2008 Act will become applicable (some types of open space or recreational land are classed as Special Category Land (SCL). As the Unsworth Academy Playing Fields are leased from BMBC as the Local Authority who own this land, they are not classified as SCL for the purposes of the 2008 Act. This is explained further in Chapter 6 of the Case for the Scheme (TR010064/APP/7.1).

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	under those sections will need to conform to the requirements of those sections.	
5.187	Existing trees and woodlands should be retained where possible. The applicant should assess the impacts on, and the loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.	<p>Further details relating to the impacts on trees are included within Appendix 7.5, Arboricultural Impact Assessment of the Environmental Statement Figures (TR010064/APP/6.3). The survey recorded five woodlands, 13 hedgerows, 143 tree groups and 69 individual trees. None of the trees are protected by a Tree Preservation Order (TPO). The site contains no veteran trees or registered ancient trees. The site is not located within a Conservation Area, where trees maybe protected as part of the overall character.</p> <p>The Scheme will require the following:</p> <ul style="list-style-type: none"> • The removal of 18 individual trees consisting of five B category trees, and 13 C category trees. • The complete removal of 39 groups of trees, 23 B category groups and 16 C category groups. • The partial removal of 19 Groups of trees, 15 B category partial groups and 4 C category partial groups. • The partial removal of one C category hedgerow. • The complete removal of one B category woodland. • The partial removal of three woodlands, one B category and one C category. <p>Chapter 7. Landscape and Visual of the Environmental Statement (TR010064/APP/6.1) sets out the measures to mitigate against the impact of the loss of trees, vegetation and hedgerows which includes:</p> <ul style="list-style-type: none"> • New hedgerow planting and planting to improve existing hedgerows in areas adjacent to the ecological areas, along new highway boundaries and around attenuation ponds to strengthen the local landscape pattern and provide wider opportunities for habitat connection.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<ul style="list-style-type: none"> • New hedgerow tree planting to strengthen new and existing hedgerows and further help integrate the motorway infrastructure into the local landscape. • Use of planting to link existing field boundary vegetation with other areas of existing vegetation in areas around the Northern Loop to improve habitat links and strengthen the local landscape pattern and character. • Planting along the Pike Fold Simister Viaduct embankment west of the M66 to provide greater landscape integration, and visual screening or filtering for viewers within nearby residential areas of Whitefield. • Planting on the Pike Fold Simister Bridge embankments and Northern Loop embankments and within the Northern Loop to provide landscape and visual integration and visual screening or filtering for viewers along Pole Lane footpath and to break up the scale of the Scheme elements for motorway travelers. • Additional planting along Pole Lane and along the nearby northbound M66 verge to provide visual screening or filtering of traffic, Pike Fold Simister Bridge and Northern Loop from within Whitefield and from Footpath12WHI along Pole Lane. • New planting of linear tree belts along the M60 northbound to M60 westbound on-slip to provide landscape and visual integration; and screening or filtering for viewers on Heywood Road and Simister Lane • Existing linear tree belts necessitating removal for carriageway widening will be reinstated with a higher percentage of feathered trees and evergreen species to improve visual screening in the early years. • Reinstatement planting along the eastbound and westbound M60 mainline verges and embankments between M60 Junction 17 and M60 Junction 18 to provide townscape and visual integration; and screening and filtering for adjacent residential areas.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<ul style="list-style-type: none"> Reinstatement planting of trees and shrubs, and species rich grassland creation, within land east of the Northern Loop to provide landscape and visual integration; and screen views from footpaths WHI8 and WHI10. <p>An Environmental Clerk of Works will ensure construction is delivered in accordance with the measures set out within Appendix N, Outline Landscape and Ecology Plan of the First Iteration EMP (TR010064/APP/6.5). This will ensure implementation of environmentally protective measures for newly planted landscaping.</p> <p>In addition, establishment of appropriate vegetation protection measures and areas for removal will be inspected by an Environmental Clerk of Works to ensure compliance with the Tree Protection Plans provided in Appendix 7.5, Arboricultural Impact Assessment of the Environmental Statement Appendices (TR010064/APP/6.3).</p> <p>The Specification for Highways Works Series 3000, Landscape and Ecology (Highways Agency, 2001) developed at detailed design stage will set out requirements for overseeing organisation the first five years of vegetation establishment and replacement of any failed stock within the establishment aftercare period.</p> <p>As set out in Requirement 5 of the draft Development Consent Order (TR010064/APP/3.1), during the establishment aftercare period and beyond, environmental features (including soft landscape features) will be routinely monitored and inspected in accordance with the requirements stipulated in the Specification for Highways Works Series 3000, Landscape and Ecology (Highways Agency, 2001).</p>
5.188	Where the proposed development has an impact on a Mineral Safeguarding Area, the Secretary of State should ensure the applicant has put forward appropriate	Chapter 10, Material Assets and Waste of the Environmental Statement (TR010064/APP/6.1) considers the requirement to safeguard mineral resources.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	mitigation measures to safeguard mineral resources.	<p>The construction of the Scheme requires land to be permanently acquired and used outside the existing highway boundary which could result in the partial sterilisation of MSA) and superficial peaty soils / horizons.</p> <p>Notwithstanding this, both mineral safeguarding sites and peat resources have been scoped out of this assessment on the basis that they are not resources that could be worked / extracted as confirmed by the Scoping Opinion (TR010064/APP/6.7).</p> <p>Where reasonably practicable, the Scheme has reduced the unnecessary sterilisation of MSAs, and there are no mineral safeguarding sites nor peat resources within the Order Limits.</p>
5.189	Where a project has a sterilising effect on land use there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors, or improving access and connectivity. Other examples include, prioritising active travel or well-designed optimised parking and storage in employment areas with appropriate landscaping.	The Scheme has been designed to keep to a minimum the footprint of the Order Limits and all the land is shown on the Land Plans (TR010064/APP/2.3) is required to construct, operate and maintain the Scheme. As set out in the Consultation Report (TR010064/APP/5.1), the amount of land within the Order Limit was reduced following statutory consultation which removed land from within the Green Belt at Whitefield.
5.190	Public rights of way, National Trails, and other rights of access to land (for example, open access land) are important recreational facilities for walkers, wheelers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access to land, and to consider what opportunities there may be to improve	<p>National Cycle Network (Route 6 is outside of the study area of the Scheme but is likely to be a destination for cyclists crossing the study area. The NCN passes through Prestwich Forest Park and passes over the M60 via a foot/cycle bridge to the west of the Scheme. This route is not impacted by the Scheme.</p> <p>There are further Transport for Greater Manchester Cycle Network links on Bury New Road, between Thatch Beach Lane and Albert Road near Whitefield Community Primary School and Ribble Road near two further primary schools in Whitefield, as well as along Heywood Road, Prestwich linking St Margaret's Church of England Primary School and Parrenthorn High School with Simister</p>

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	<p>access and connectivity. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.</p>	<p>and Castle Road and Aviation Road in Unsworth. There are also a variety of mountain bike trails within Prestwich Forest Park and along the River Irwell. These routes also provide access to open space to the north. These cycle routes are not impacted by the Scheme.</p> <p>Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1) outlines effects on WCH as a result of the Scheme including mitigation measures.</p> <p>Replacement routes will be provided for the existing PROW affected by the Scheme, including any Public Footpaths where they are affected by new drainage ponds, wetlands or swales. A replacement PROW is being included where the Northern Loop footprint will impact on an existing PROW and is being realigned around the Northern Loop. There are also two PROW south of Junction 18 which are being extinguished and a replacement route through the biodiversity mitigation area provides a better quality route to the extinguished path.</p> <p>Existing routes and any changes as a result of the Scheme are set out at Schedule 4 of the draft Development Consent Order (TR010064/APP/3.1) and shown on the Streets, Rights of Way and Access Plans (TR010064/APP/2.5). They are also shown on Figure 2.2, the Scheme Design and Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2).</p>
5.191	<p>Public rights of way can be extinguished under section 136 of the Planning Act if the Secretary of State is satisfied that an alternative has been or will be provided or it is not required.</p>	<p>Replacement routes will be provided for the existing PROW affected by the Scheme, including any Public Footpaths where they are affected by new drainage ponds, wetlands or swales. A replacement PROW is being included where the Northern Loop footprint will impact on an existing PROW and is being realigned around the Northern Loop. There are also two PROW south of Junction 18 which are being extinguished and a replacement route through the biodiversity mitigation area provides a better quality route to the extinguished path.</p>

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		Existing routes and any changes as a result of the Scheme are referenced in the draft Development Consent Order (TR010064/APP/3.1) and shown on the Streets, Rights of Way and Access Plans (TR010064/APP/2.5). They are also indicated on Figure 2.2, the Scheme Design and Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures (TR010064/APP/6.2).
<i>Decision making</i>		
5.192	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements. Additionally, if the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account the positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	This is considered in Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1) and addressed in response to draft NPS NN paragraph 5.176. No permanent loss of open space, playing fields or recreational buildings is proposed. Part of Pike Fold Golf Course will need to be redesigned to accommodate the Scheme design and discussions to mitigate this impact have taken place and will continue. No other recreational land will be lost or permanently impacted by the Scheme. This includes Prestwich Heys Football Club, Unsworth Cricket and Tennis Club, Heaton Park and Eden Park Gardens and Simister Allotments.
5.193	Where networks of green infrastructure have been identified in development plans, they should be protected from development, and, where possible, strengthened. The environmental and visual value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account, including the creation of new green infrastructure, when assessing	Existing routes and any changes as a result of the Scheme are referenced in the draft Development Consent Order (TR010064/APP/3.1) and shown on the Streets, Rights of Way and Access Plans (TR010064/APP/2.5). They are also indicated on Figure 2.2, the Scheme Design and Figure 2.3, the Environmental Masterplan, of the Environmental Statement Figures (TR010064/APP/6.2).

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	the impact on green infrastructure. The value of the development in improving connectivity, particularly through active travel links and recreation should also be taken into account when assessing the impact on green infrastructure.	
5.194	The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise the impact on soil or soil resources.	See the response to NPS NN paragraph 5.180 above.
5.195	Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any Development Consent Order, the Examining Authority and the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. When located in the Green Belt, elements of many	<p>Currently, approximately 68 hectares of land within the Order Limits surrounding M60 Junction18 is within the Green Belt. If Places for Everyone is adopted in its current form, then the land to the north east of the Order Limits will be removed from the Green Belt therefore reducing the overall amount of Green Belt in the Order Limits by approximately 19 hectares. However, parts of the Order Limits to the west, north and south of the M60 and west of the M66 will still be within the Green Belt.</p> <p>Chapter 6 of the Case for the Scheme (TR010064/APP/7.1) provides an assessment of the Scheme against the purposes of Green Belt Policy, having regard to both the draft NPS NN and the NPPF.</p> <p>Overall, it is concluded that the Scheme is not classed as local transport infrastructure and although it is an engineering operation, the scale and permanence of the Scheme will impact on the openness of the Green Belt.</p>

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	<p>national networks infrastructure projects will comprise inappropriate development. In such cases, scheme promoters will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the safety benefits associated with improvements to the relevant section of the national network.</p>	<p>As such, on balance, it is considered that very special circumstances (VSC) must be demonstrated to evidence that other considerations outweigh any potential harm to the Green Belt.</p> <p>The Applicant consider the VSC to include:</p> <p><i>The Need for the Scheme.</i></p> <p>The Scheme improves national infrastructure and is part of a national investment strategy for the strategic road network in England. This is consistent with the overall objectives for National Networks set out in the draft NPS NN.</p> <p><i>The Benefits of the Scheme:</i></p> <p>The Scheme provides future capacity for the forecast growth in traffic to deliver national networks which are resilient and meet the long-term needs. A key objective of the Scheme is to address the problem of congestion, which causes slow and unreliable journeys and reduces economic efficiency.</p> <p>As set out in Section 4 of the Case for the Scheme (TR010064/APP/7.1), the most significant benefit of the Scheme is due to travel time savings. The Scheme will alleviate congestion that will otherwise worsen without the Scheme. As a result of the Scheme, this part of the strategic road network would operate within capacity up to and beyond 2044 and traffic using the M60 Junction 18 would save up to 1.5 minutes compared to current journey times during normal traffic conditions.</p> <p>As set out in Section 5 of the Case for the Scheme (TR010064/APP/7.1), the overall economic benefits of the Scheme provide a Present Value of Benefits of £137.5 million.</p> <p><i>The lack of alternatives with less impact on the Green Belt:</i></p> <p>Given that the purpose of the Scheme is to improve an existing section of the strategic road network, it is not possible to pursue an option which is outside the Green Belt, unless the surrounding motorway network is relocated entirely.</p>

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Historic Environment		
<i>Applicant's assessment</i>		
5.202	<p>The applicant should undertake an assessment of any significant heritage impacts of the proposed project and should describe the significance of any heritage assets affected, including any contribution made to their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes, heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.</p>	<p>An assessment has been undertaken to identify likely significant heritage impacts from the Scheme and to identify appropriate mitigation measures. This has utilised all publicly available sources such as the local Historic Environment Record. The methodology and findings of the assessment are presented in Chapter 6, Cultural Heritage of the Environmental Statement (TR010064/APP/6.1).</p> <p>The determination of asset significance is central to understanding to what degree the historic assets will be affected by the changes arising from the Scheme. Appendix 6.1, Cultural Heritage Desk-Based Assessment of the Environmental Statement Appendices (TR010064/APP/6.3) sets out the detail about the heritage assets affected and has determined their value through a series of processes including the extent to which setting contributes to the assets in question. The desk-based assessment has been compiled in accordance with the Standard and Guidance provided by the Chartered Institute for Archaeologists (CIfA).</p> <p>Asset significance has been assessed along with the level of contribution it makes to asset value. Significant assets were identified in the study area but none would undergo changes to their setting that will result in negative significant effects.</p> <p>Archaeological assets were identified from the local Historic Environment Record and their asset value determined using their likely date and archaeological importance on a local, regional and national level. Those known assets within the Order Limits were identified as having a low value based on the criteria. The mitigations identified are based on national criteria for investigation to inform the need for and scope of mitigation as stated in 5.127. Archaeological trial trench investigation of known assets has been agreed with the Greater Manchester Archaeological Advisory Service, and that work together with any follow-up</p>

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		mitigation work will be carried out to approved Written Schemes of Investigation (“WSI”) (see the response to draft NPS NN paragraph 5.203 below in terms of how the WSI will be secured).
5.203	The discovery of heritage assets has potential to have a significant delay on scheme development, and applicants should ensure that protection of the historic environment is considered early in the development process.	<p>Measures to identify the presence of heritage assets at risk of harm from construction or operation of the Scheme have included desk-based assessments, aerial investigation and mapping studies.</p> <p>A programme of archaeological investigation has been identified to target known archaeological remains and reduce the risk of unexpected discovery. Measures to identify the presence of heritage assets at risk of harm from construction or operation of the Scheme have included desk-based assessments, aerial investigation and mapping studies. These are reproduced or summarised in Environmental Statement S Appendix 6.1 Cultural Heritage Desk-Based Assessment.</p> <p>The need for archaeological mitigation on one possible archaeological site is set out in the REAC contained within the First Iteration EMP) (TR010064/APP/6.5), with the remaining need for and scope of mitigation determined through archaeological trial trench investigation of previously undisturbed areas of scheme land-take. All such work will be secured through approved WSIs.</p> <p>The exact scope of the investigation work required above will be agreed with the Greater Manchester Archaeological Advisory Service in advance of fieldwork and will be subject to approved WSIs which are detailed method statements) prepared by an archaeological contractor. This would commence during the detailed design stage (if the DCO is consented. The WSI will be secured by Requirement 9 of the draft DCO (TR010064/APP/3.1).</p>
<i>Recording</i>		
5.204	A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the	See the response to NPS NN paragraph 5.203.

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	asset should not be a factor in deciding whether consent should be given.	
5.205	Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of this requirement should be proportionate to the importance and impact. Applicants should be required to deposit copies of the report with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it.	See the response to NPS NN paragraph 5.203.
5.206	The Secretary of State may add requirements to the Development Consent Order to ensure that this is undertaken in a timely manner in accordance with a written scheme of investigation that meets the requirements of this section and has been agreed in writing with the relevant Local Authority (or, where the development is in English waters, with the Marine Management Organisation, English Heritage and / or Historic England) and the completeness of the exercise is properly secured.	The archaeological trial trench investigation will be preceded by a WSI approved by the Greater Manchester Archaeological Advisory Service. See the response to draft NPS NN paragraph 5.203.

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5.207	Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State should consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	Protocols for the discovery of unexpected archaeological remains have been included in the REAC in the First Iteration of the EMP (TR010064/APP/6.5).
<i>Decision making</i>		
5.208	<p>In determining application, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset). The Secretary of State should take account of the available evidence and any necessary expertise from:</p> <ul style="list-style-type: none"> • relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application • any designated records • the relevant Historic Environment Record(s), and similar sources of information • representations made by interested parties during the examination 	<p>Figure 6.2, Built Heritage Assets of the Environmental Statement Figures (TR010064/APP/6.2) shows the location of Brick Farmhouse, Cold Gate Farm and Droughts Farm. The conclusions from Appendix 6.1: Cultural Heritage Desk-Based Assessment of the Environmental Appendices (TR010064/APP/6.3) on those assets are described below.</p> <p>Temporary slight adverse effects have been identified on Brick Farmhouse during construction of the Scheme due to adverse changes in setting. This effect will be not significant. During operation of the Scheme Brick Farmhouse will not experience any adverse effects.</p> <p>Cold Gate Farm and Droughts Farm have been identified as non-listed historic properties where construction noise levels will negatively affect the setting of the houses during some of the construction phase, amounting to slight adverse effects. These effects are not significant given the changes to setting already present from the existing road layout and whilst the changes will be adverse, they stop short of being significant. No other historic properties, listed or non-listed, have been identified as experiencing adverse operational effects.</p> <p>Permanent land take to construct the Scheme on the north side of Junction 18 to enable the proposed junction improvements will affect the setting of Cold Gate Farm more than Droughts Farm, during operation, given the extent to which the highway boundary will be brought closer to the former than the latter. Cold Gate</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<ul style="list-style-type: none"> expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it 	<p>Farm will experience a slight adverse effect whilst the effect on Droughts Farm will be neutral. These levels of effect are not significant.</p> <p>Landscaping mitigation will reduce the visual effects of the Scheme. Whilst the visual setting change during operation will affect the two non-designated properties negatively, the Scheme has to be considered in the context of the great extents to which their setting has already been changed by the existing motorway infrastructure.</p> <p>Chapter 6, Cultural Heritage of the Environmental Statement (TR010064/APP/6.1) sets out the potential impacts to the Heaton Park Registered Park and Garden during construction will be temporary visual intrusion which will affect views from the northern part of the designated park.</p> <p>During operation of the Scheme the additional road infrastructure will result in small negative changes to the setting of Heaton Park Registered Park and Garden resulting in a slight adverse effect. This effect is not significant.</p> <p>Unsworth Moss historic landscape character unit (HGM7712) will undergo the greatest degree of change owing to the Northern Loop. The magnitude of impact will be neutral during operation of the Scheme, given this part of the Moss has no significant peat remains and therefore a negligible archaeological potential. On the other parcels of land adjacent to the motorway, small scale impacts will be experienced amounting to negligible adverse, resulting in a neutral effect. This is because the minimal land take will be on land already disturbed by previous construction activity.</p> <p>Overall, only minor effects are anticipated on heritage as a result of the Scheme.</p>
5.209	<p>In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset, and the value that they hold for this and future generations. This</p>	<p>See the response to draft NPS NN paragraph 5.208.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	understanding should be used to avoid or minimise conflict between their conservation and aspect of the proposal.	
5.210	The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities – including their economic vitality. The Secretary of State should also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting).	See the response to draft NPS NN paragraph 5.208.
5.211	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that	As outlined in response to draft NPS NN paragraph 5.208, only minor adverse effects are anticipated from the impact of the Scheme on heritage assets.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building, or a grade II Registered Park or Garden should be exceptional. Substantial harm to, or loss of, designated assets of highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.</p>	
5.212	<p>Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of the development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.</p>	<p>As outlined in response to draft NPS NN paragraph 5.208, only minor adverse effects are anticipated from the impact of the Scheme on heritage assets.</p>
5.213	<p>Where the proposed development will lead to substantial harm to, or total loss of, significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that it is necessary to deliver substantial public benefits that outweigh that loss or harm. Alternatively, that all of the following apply:</p> <ul style="list-style-type: none"> the nature of heritage asset prevents all reasonable uses of the site 	<p>As outlined in response to draft paragraph 5.208, only minor adverse effects are anticipated from the impact of the Scheme on heritage assets.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<ul style="list-style-type: none"> no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible the harm or loss is outweighed by the benefit of bring the site back into use 	
5.214	Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefit of the proposal, including securing its optimum viable use.	The less than substantial harm identified for designated heritage assets relate to changes to the setting of a single heritage asset: the Heaton Park Historic Park and Garden. The designation has undergone a number of different episodes of change since its creation, including the development of a golf course in the 1920's within which context the Scheme has been assessed.
5.215	Not all elements of a World Heritage Site or Conservation Area will necessarily contribute towards its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either substantial harm or less than substantial harm, as appropriate. This should take into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole.	As outlined in response to draft NPS NN paragraph 5.208, only minor adverse effects are anticipated from the impact of the Scheme on heritage assets.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.216	Where the loss of significance of any heritage asset has been justified by the applicant based on the merits of the new development and the significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring, until the relevant development or part of the development has commenced.	Archaeological assets have been identified in the assessment as being liable to be lost or degraded as part of the Scheme. These impacts would occur from land-take and impacts arising from temporary construction zones. The relevant assets will be targeted with archaeological trial trenches to inform the need for and scope of mitigation to be applied.
5.217 – 5.218	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to, or better reveal, the significance of the asset should be treated favourably. Where there is evidence of deliberate neglect of, or damage to, a heritage asset the Secretary of State should not take its deteriorated state into account in any decision.	The Scheme does not impact on any Conservation Areas or World Heritage Sites. There are no significant adverse effects to the setting of any other designated or non designated assets. No assets identified as relevant to the Scheme were identified as being of a deteriorated state and the asset values assigned reflected this in the assessment.
Noise and Vibration		
<i>Applicant's assessment</i>		
5.222	Where noise impacts are likely to arise from the proposed development, the applicant	The impact of noise is assessed in Chapter 11, Noise and Vibration of the Environmental Statement (TR010064/APP/6.1).

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>should include the following in its noise assessment:</p> <ul style="list-style-type: none"> • a description of the noise sources including the likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise • identification of noise sensitive premises and noise sensitive areas that may be affected • the characteristics of the existing noise environment • a prediction on how the noise environment will change with the proposed development: <ul style="list-style-type: none"> • in the shorter term such as during the construction period • in the longer term during the operating life of the infrastructure • at particular times of the day, evening and night (and weekends) as appropriate • an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas, including identifying 	<p>The location of noise sensitive receptors is shown on Figure 11.2, Noise Sensitive Receptors in the Environmental Statement Figures (TR010064/APP/6.2). This includes during the construction and operational phases.</p> <p>These assessments show that although construction noise and vibration will be mitigated for many noise sensitive receptors, the Scheme would result in the following residual negative adverse effects during construction:</p> <ul style="list-style-type: none"> • Temporary significant adverse effect for up to 275 receptors during daytime construction works. • Temporary significant adverse effect for up to 647 receptors during night-time construction works. <p>Mitigation measures are summarised in response to draft NPS NN paragraph 5.227 below.</p> <p>No significant beneficial or significant adverse effects are anticipated for operational noise. See the response to NPS NN paragraph 5.224 below.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>whether any particular groups are more likely to be affected</p> <ul style="list-style-type: none"> measures to be employed in mitigating the effects of noise applicants should consider using the best available techniques to reduce noise impacts. 	
5.223	<p>The potential for noise impacts elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on national networks, should be considered as appropriate.</p>	<p>The assessment of road traffic noise includes consideration of changes in road traffic noise for all road links where a significant change in noise is predicted, regardless of whether they are close to the Scheme or at a greater distance.</p>
5.224	<p>Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise and Common Noise Assessment Methods (CNOSSOS). The prediction of noise from new railways should be based on the method described in the Calculation of Railway Noise and Common Noise Assessment Methods (CNOSSOS). For the prediction, assessment and management of construction noise, reference should be made to the relevant British Standards and other guidance which also gives examples of mitigation strategies.</p>	<p>Chapter 11, Noise and Vibration of the Environmental Statement (TR010064/APP/6.1) assesses operational noise and the predictions of road traffic noise. The assessment has been undertaken following the calculation methodology provided in Calculation of Road Traffic Noise (Department of Transport and Welsh Office, 1988). The assessments of construction noise and vibration have been undertaken with reference to BS 5228 Part 1 (BSI, 2014a) and Part 2 (BSI, 2014b).</p> <p>For operational noise, the Chapter 11 Noise and Vibration of the Environmental Statement (TR010064/APP/6.1) concludes that there are:</p> <ul style="list-style-type: none"> No overall permanent significant beneficial effects identified. No significant adverse effects identified.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.225	<p>The applicant should consult Natural England with regard to the assessment of noise on designated nature conservation sites, protected landscapes, protected species and other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.</p>	<p>Likely significant effects on internationally, nationally and locally designated sites, habitats and species are considered in Chapter 8, Biodiversity of the Environmental Statement (TR010064/APP/6.1) which concludes no significant adverse effects on any of these receptors.</p> <p>The HRA provided in Appendix 8.13 of the Environmental Statement Appendices (TR010064/APP/6.3) also assesses likely significant effects on internationally designated sites. A Stage 1 Screening Assessment concluded that likely significant effects could not be discounted for the Rochdale Canal SAC and SSSI, when considered alone or in-combination with other '<i>plans and projects</i>'. Therefore, a Stage 2 Statement to Inform Appropriate Assessment must be carried out. This concluded that the Scheme will not adversely affect the integrity of the Rochdale Canal SAC and SSSI during its construction or operational phases, either alone or in combination with other '<i>plans or projects</i>'.</p> <p>The Applicant sought the advice of Natural England in producing the HRA through the statutory consultation in February 2023. This advice has been followed by progressing the HRA to Stage 2 appropriate assessment. Subsequent consultation with Natural England has been undertaken throughout 2023 under a Discretionary Advice Service contract and the Applicant has had due regard to Natural England's advice feedback in completing the assessment. Appendix 8.13: Habitats Regulations Assessment Report of the ES Appendices (TR010064/APP/6.3) has been shared with Natural England for their review and feedback and Natural England have confirmed that they agree with the conclusions of the HRA and have no further comments.</p>
<i>Mitigation</i>		
5.226	<p>The Examining Authority and the Secretary of State should consider whether mitigation measures are needed for both operational and construction noise over and above any which form part of the project application. The Secretary of State may wish to impose</p>	<p>See the response to draft NPS NN paragraph 5.227 below.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	requirements to ensure delivery and future maintenance of all mitigation measures.	
5.227	<p>Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following:</p> <ul style="list-style-type: none"> • engineering: containment of noise generated • materials: use of materials that reduce noise, (for example, low noise road surfacing) • lay-out: adequate distance between source and noise-sensitive receptors • incorporating good design: to minimise noise transmission through landscaping and screening by natural or purpose-built barriers including topographical changes • administration: specifying acceptable noise limits or times of use (for example, in the case of railway station public address systems) 	<p>Measures to reduce the noise from construction activities are included in the First Iteration EMP(TR010064/APP/6.5) and incorporated into working practices. The First Iteration EMP includes an Outline Noise and Vibration Management Plan which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration EMP contains a REAC, that includes measures to reduce noise from construction activities, as summarised below.</p> <ul style="list-style-type: none"> • The use of Best Practicable Means (BPM) during construction. • Appropriate selection of plant and construction methods. • Choice of routes and timings for the transport of construction materials, waste materials and personnel to reduce the risk of increased noise and vibration impacts due construction. • Community liaison will keep residents updated about upcoming works that will directly impact them via letter, email or a virtual information hub. • During the noisiest phases of night-time works the contractor will review the temporal scope to aim to reduce adverse impacts to be within 10 or more nights in any consecutive 15 nights, or a total of more than 40 nights in any consecutive 6-month period for noise levels above Significant Observed Adverse Effect Level (SOAEL) at receptors where this is practicable. • For diversion routes used during construction the contractor will keep the timetable for full closures under review and aim to keep the number of night closures to below the temporal scope of 10 or more nights in any consecutive 15 nights, or a total of more than 40 nights in any consecutive 6-month period. • During preparation of areas for compounds and the attenuation ponds there is often a layer of topsoil that needs to be stripped off before the location can be used. It may be practicable to stockpile this material so it can act as noise screening for nearby receptors.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<ul style="list-style-type: none"> The provision of temporary noise screening at the edge of working areas where an existing road traffic noise barrier needs to be temporarily removed to allow access to construction plant to working areas. Examine measures to limit the magnitude of vibration during piling of retaining walls. <p>Once the Scheme is operational, the road surface will be better in terms of noise reducing properties than a conventional Low Noise Surface. The road surface is a factor in the amount of noise that is produced by the interaction of the tyres with the road, and the better performing surface will have a Road Surface Influence (“RSI”) of -6.0 dB compared to -3.5 dB for a conventional LNRS. This reduces road traffic noise at source therefore reducing road traffic noise for all receptors, also removing locations where significant adverse effects may have otherwise been predicted. However, the way in which noise improvements are calculated means that they cannot be classed as beneficial over the long-term, although in quantitative terms more receptors experience a reduction in noise than will experience an increase.</p>
5.228	<p>For most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on, and provide powers to, the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with construction and operational noise. An indication of the likely eligibility for such compensation should be included in the assessment. In extreme cases, the applicant may consider it appropriate to provide noise mitigation, through compulsory acquisition of affected properties in order to gain consent for what might otherwise be an unacceptable</p>	<p>The Noise Insulation Regulations 1973 protect residents subject to increases in traffic noise at or above a specified level arising directly from the use of new or altered roads, by making available grants for noise insulation work to be carried out on their homes. The eligibility criteria are described in Appendix 11.2: Noise and Vibration Assessment Guidance and Standards of the Environmental Statement Appendices (TR010064/APP/6.3).</p> <p>In summary, to be eligible a dwelling must be within 300m of the Scheme, have a noise level above 68dB LA10,18h, and experience a 1dB(A) increase in long-term noise levels. There are no dwellings that have been identified as being potentially eligible for noise insulation from increases in road traffic noise as a result of the Scheme.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	development. Where mitigation is proposed to be dealt with through compulsory acquisition, such properties would have to be included within the Development Consent Order land in relation to which compulsory acquisition powers are being sought.	
5.229	Applicants should consider opportunities to address the noise issues associated with Important Areas as identified through the noise action planning process.	<p>The NIAs are shown on Figure 11.1a (Noise Study Areas, Noise Important Areas and Existing Noise Barriers) as well as Figure 2.1, Environmental Constraints of the Environmental Statement Figures (TR010064/APP/6.2). There are five NIAs within 600m of the Order Limits. Three of them are directly adjacent to the motorway network and the remaining two are located adjacent to the local road network on Bury New Road and Higher Lane.</p> <p>There are predicted reductions of up to 5.1decibels (dB) in road traffic noise levels for some receptors within the NIA 1671 (adjacent to the M60 between Junction 17 and Junction 18) that, in the short-term, will be noticeable and considered to be a likely short-term significant beneficial effect, reducing to not-significant over the long term.</p> <p>There are no other changes in road traffic noise of greater than 1dB predicted within other NIAs.</p>
<i>Decision making</i>		
5.230	Developments must be undertaken in accordance with statutory requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the government's associated planning guidance on noise.	This is assessed in Chapter 11 Noise and Vibration of the Environmental Statement. (TR010064/APP/6.1). This presents the assessment of impacts from noise and vibration using standard methodology, National Highways Design Manual for Roads and Bridges LA 111. It is therefore considered that the Scheme can be measured against the policy requirements of the Noise Policy Statement for England and the National Planning Policy Framework.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.231	<p>The project should demonstrate good design through optimisation of scheme layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project should also consider the need for the mitigation of impacts elsewhere on the road and rail networks that have been identified as arising from the development, according to government policy.</p>	<p>This is assessed in Chapter 11, Noise and Vibration of the Environmental Statement (TR010064/APP/6.1).</p> <p>In the early design of the Scheme, the route alignment was considered in order to avoid or minimise impacts on communities or individual receptors. As the design progressed, this has been optimised with the consideration of noise barriers and low noise surfacing, as described in the response to draft NPS NN paragraph 5.227 above.</p>
5.232	<p>The Secretary of State should not grant development consent unless satisfied that the proposals will meet the following aims, within the context of government policy on sustainable development:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise as a result of the new development • mitigate and minimise other adverse impacts on health and quality of life from noise from the new development • contribute to improvements to health and quality of life through the effective management and control of noise, where possible. 	<p>The Scheme will give rise to significant adverse effects during construction, although with the mitigation measures proposed the overall number of properties impacted is reduced.</p> <p>As shown on Figure 11.2, Noise Sensitive Receptors provided in the Environmental Statement Figures (TR010064/APP/6.2), the Order Limits is within a densely populated part of Greater Manchester with residential properties adjoining both the motorway and planned diversion routes. It is very difficult to construct the Scheme without night time working, both in terms of impacts to users and protecting the safety of workers. Night time working gives rise to the most significant effects, as the baseline noise levels at night are lower and receptors and are more sensitive to the introduction of any noisy activities. Night time working and diversions to the Local Road Network (“LRN”) during full motorway closures will be required during the three year and a half years construction period.</p> <p>Therefore, even with mitigation in place, residual significant adverse effects are predicted for 275 receptors during daytime construction works and 647 receptors during night-time construction works.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		<p>As outlined in response to paragraph 2.227, the Principal Contractor will seek to minimise and stagger night time working to reduce the overall impact. The Principal Contractor is undertaking further investigation so that noise can be reduced further. Appendix B, Outline Noise and Vibration Plan of the First Iteration EMP (TR010064/APP/6.5) sets out these measures.</p>
5.233	<p>In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the noise levels from the project do not exceed those described in the assessment or any other estimates on which the decision was based.</p>	<p>See the response to draft NPS NN paragraph 5.232.</p>
<p>Socio-economic impacts</p>		
<p><i>Introduction</i></p>		

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.234	The construction and operation of nationally significant infrastructure projects may have short or longer term economic and social impacts on local communities, businesses or services. The construction period for significant projects can be lengthy; however, this can generate employment through the construction period and benefit the local economy. Applicants should look to maximise local employment opportunities during construction and operational phases.	<p>The impact of the Scheme on the local community is assessed Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1). The construction impacts of the Scheme will not disrupt access to employment but may cause inconvenience at certain times, for example during full night time motorway closures or where diversions of PROW y are required.</p> <p>There is potential for the Principal Contractor to offer employment and training opportunities, which may be taken up by local residents. This may help to reduce health inequalities by tackling unemployment in the local area.</p>
<i>Applicant's assessment</i>		
5.235	Where the project is likely to have socio-economic impacts at local or regional level, the applicant should undertake and include in their application an assessment of these impacts.	<p>An assessment of the transport and economic case for the Scheme is provided by Chapters 4 and 5 of the Case for the Scheme (TR010064/APP/7.1).</p> <p>One of the main objectives of the Scheme is to address the problem of congestion, which causes slow and unreliable journeys and reduces economic efficiency. The largest predicted source of monetised benefits is due to travel time savings, as the Scheme will relieve congestion that would otherwise worsen without the Scheme.</p> <p>The economic benefits of the Scheme described in Section 5 of the Case for the Scheme and can be summed to give an overall value, known as the Present Value of Benefits (PVB). The Scheme is forecast to generate an adjusted PVB of £137.52m.</p>
5.236	<p>This assessment should consider all relevant socio-economic impacts which may include:</p> <ul style="list-style-type: none"> the creation of jobs and training opportunities. Applicants may wish to 	Relevant socio-economic impacts have been assessed in Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1) in relation to the social determinant of health 'Connections to employment, services, facilities and leisure' and 'employment opportunities including training opportunities' during construction. The impacts are described in Section 12.18 of Chapter 12, Population and Human Health. As noted in the

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK’s transition to net zero</p> <ul style="list-style-type: none"> • the value of increased connectivity on productivity and access to jobs, services and housing • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities. Applicants should engage with local businesses and the local community at the pre-construction phase to understand the opportunities for businesses and the community throughout construction, such as employment or educational programmes • any indirect beneficial impacts for the region hosting the infrastructure, particularly in relation to the use of local support services and supply chains • effects on tourism • cumulative effects – if development consent were to be granted to for a number of projects within a region and these are developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region. 	<p>assessment, there is uncertainty over the precise number of new jobs created as construction plans continually evolve and so do market and employment conditions. The Applicant has included commitments in section 12.17 of Chapter 12, Population and Human Health to set targets for its Employment and Skills Strategy (commitment PHH22 in the REAC, contained within the First Iteration EMP (TR010064/APP/6.5)), to monitor performance against those targets (commitment PHH23 in the REAC), to advertise job openings in local job centres (commitment PHH24), to set targets for spend through small and medium-sized enterprises (commitment PHH25), and to offer apprenticeships and work placements and STEM ambassadors to work with local schools and colleges (commitment PHH26 in the REAC). This will have a positive impact on the local economy, as well as access to training and education, although the level of benefit is currently uncertain.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.237	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to the development's socio-economic impacts correlate with local planning policies.	See the response to draft NPS NN paragraph 5.236. An assessment against the policies of the adopted and emerging development plan, including social and economic policies, is provided in Chapter 6 of the Case for the Scheme (TR010064/APP/7.1).
<i>Mitigation</i>		
5.239	The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	An assessment of the transport and economic case for the Scheme is provided by chapters 4 and 5 of the Case for the Scheme (TR010064/APP/7.1). Chapter 12, Population and Human Health of the Environmental Statement (TR010064/APP/6.1) assesses that the Scheme will not impact on the local community accessing local employment opportunities. The improvement in journey times will result in economic benefits as set out in Chapter 5 in the Case for the Scheme.
<i>Decision making</i>		
5.241	The Secretary of State should have regard to the potential socio-economic impacts of new infrastructure identified by the applicant and from other sources that the Secretary of State considers to both relevant and important to its decision.	See the response to draft NPS NN paragraph 5.239.
5.242	The Secretary of State should consider any relevant positive provisions, the applicant has made, or is proposing to make, to mitigate impacts (for example through planning obligations), and any legacy benefits that may arise. As well as any	No planning obligations have been proposed and it is not anticipated that any will be required.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	options for phasing development in relation to socio-economic impacts.	
Water quality and resources		
<i>Introduction</i>		
5.244	<p>The planning system should contribute to and enhance the natural and local environment by, amongst other things, preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by, water pollution. The government has issued guidance on water supply, wastewater and water quality considerations in the planning system. Where applicable, an application for a Development Consent Order has to contain a plan with accompanying information identifying water bodies in a River Basin Management Plan.</p>	<p>The detailed assessments of the impact of the Scheme on water quality are included in Appendix 13.1, Water Framework Directive Compliance Assessment and Appendix 13.2 Water Quality Assessment of the Environmental Statement Appendices (TR010064/APP/6.3). These detailed compliance assessments comply with the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (the “WFD” Regulations’).</p> <p>The Environment Agency, as competent authority in England, must exercise its relevant functions so as to secure compliance with the Water Framework Directive Regulations so as best to secure the achievement of the following environmental objectives:</p> <ul style="list-style-type: none"> • Measures will be put in place to prevent deterioration of the surface water status or groundwater status of a body of water (subject to the application of Regulations 18 and 19). • Measures will otherwise support the achievement of the environmental objectives set for a body of water (subject to the application of Regulations 16 to 19). <p>Some of the construction and operation activities will lead to localised negative changes to water quality elements. However, with the implementation of mitigation, these impacts are unlikely to lead to deterioration in classification and/or prevent the water quality elements from either achieving good classification or achieving the Environment Agency’s River Basement Management Plan objectives. This is set out in Table 6.7 Appendix 13.2 Water Quality Assessment of the Environmental Statement Appendices</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
		(TR010064/APP/6.3). It is considered that at a water body scale, the Scheme will be compliant for all designated water bodies assessed.
<i>Applicant's assessment</i>		
5.245	<p>Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing or water quality activity or groundwater activity permits, and with water supply companies likely to supply the water. Where development is likely to have adverse effects on the water environment, the applicant should undertake an assessment of the existing status and impacts of the proposed project on water quality, water resources and physical characteristics of the water environment as part of the Environmental Statement or equivalent. The assessment should also include how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment (see paragraphs 4.30 to 4.41).</p>	<p>See the response to draft NPS NN paragraph 5.244. The Scheme will not have a negative impact on the water environment.</p> <p>Measures to manage the risks of pollution during construction are set out in the REAC with the First Iteration EMP((TR010064/APP/6.5). They are also set out within Appendix H, Outline Surface Water Management Plan and Appendix L, Outline Emergency Procedures and Environmental Incidents of the First Iteration Environmental Management Plan. The Outline Management Plans will be developed into the Surface Water Management Plan and Emergency Procedures and Environmental Incidents as part of the Second Iteration EMP for implementation during construction and secured by Requirement 4 of the draft Development Consent Order (TR010064/APP/3.1)</p> <p>No abstraction of water is proposed.</p> <p>A list of all the potential consents/permits/licences which may be required to construct the Scheme are set out in the Consents and Agreements Position Statement (TR010064/APP/3.3). For the water environment, this includes:</p> <ul style="list-style-type: none"> • Agreement to use herbicide in or near water. • S106 Foul sewer connection. • Trade effluent consent. • Environmental Permit Flood Risk Activity (FRAP). • Ordinary Watercourse Consent (temporary or permanent) • Water Abstraction (Temporary / Permanent). • Water Abstraction – Passive dewatering. • Water Transfer (during construction or operation). • Environmental Permit for Water Discharges.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
5.246	For those projects that are improving the existing infrastructure, such a road widening, opportunities should be taken, where feasible, to improve the quality of existing discharges where these are identified and shown to contribute towards Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (“Water Framework Regulations”) commitments. A permit under the Environmental Permitting Regulations may also be required where improvements are being made to existing infrastructure, for example, the discharge of contaminated water from roads.	<p>Routine runoff assessments and spillage risk assessments have been undertaken. Full details of the methodology, data used and results are presented in Appendix 13.2: Water Quality Assessment Report of the Environmental Statement Appendices (TR010064/APP/6.3). The results of the assessment have been used to inform the magnitude of impact.</p> <p>With mitigation measures incorporated into the assessment, all discharge outfalls achieve the required standards. As such, the magnitude of impact on water quality, with embedded mitigation, is negligible for all outfalls except for two existing outfalls (outfall 1 and 2), where the quality of water discharges will be improved as water quality treatment is not currently present. Therefore, the opportunity to incorporate designing treatment measures for these two drainage catchments leads to a minor beneficial magnitude of impact, resulting in a slight beneficial effect.</p>
5.247	Under Environmental Permitting Regulations, applicants are required to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids. For example, from car parks or other areas of hard standing, during operation. Consent may be required for working near to a river from the Environment Agency and a pollution incident response plan is recommended.	Measures to manage the risks of pollution during construction are contained within the REAC and also within Appendix H, Outline Surface Water Management Plan and Appendix L, Outline Emergency Procedures and Environmental Incidents of the First Iteration EMP (TR010064/APP/6.5).
5.248	Applicants should consider protective measures to control the risk of pollution to	Appendix 13.2: Water Quality Assessment Report of the Environmental Statement Appendices (TR10064/APP/6.3) includes an assessment of spillage

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>groundwater beyond those outlined in Environmental Management Plans - this could include, for example, the use of protective barriers.</p>	<p>risk. This assessment has concluded that the risk of a serious chemical spillage from all road catchments is low.</p> <p>Isolation chambers fitted with penstock valves will be located at the downstream end of the drainage systems. This will allow isolation of the pollutants within the highway drainage system thereby avoiding pollution to receiving watercourses.</p> <p>The Scheme will consist of six separate road drainage catchments for road runoff, albeit this drains to four attenuation and a treatment pond. Attenuation storage would be provided in the form of attenuation ponds, swales and oversized pipes depending on the site constraints.</p> <ul style="list-style-type: none"> • Where practicable, ponds are the preferred method of attenuation storage. • Sediment forebays are to be provided at the inlet of all attenuation ponds which will provide effective pre-treatment (i.e. removal of coarse sediments) and ensure ease of maintenance during the removal of any such collected coarse sediments. The main storage compartment, after the sediment forebay, for all of the attenuation ponds is to have a 0.3m depth permanent water pool which will act as the main surface water treatment zone. • Where required the proposed attenuation ponds can also be cascaded (contain multiple storage compartments) to increase the residence time and enable the additional sedimentation of particulate matter to occur. In addition, proposed attenuation ponds will be planted with vegetation sufficiently robust to withstand the potential pollutants suspended in the surface water runoff which will provide additional water quality treatment benefits. • The vegetation in swales / vegetated ditches will slow the surface water flow rate provided the flow is at or below the level of the vegetation. This will increase water residence time in the swale and force sediments and other potential pollutants to settle out.

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		<ul style="list-style-type: none"> • Check dam provision will be assessed at the detailed design stage. Where feasible swales / vegetated ditches are provided from some attenuation ponds (where practicable) as an added level of treatment prior to the surface water discharging to the receiving watercourse. • Filter drains will filter out some fine sediments, metals, hydrocarbons and other pollutants as the surface water percolates down through the trench fill material overlying the perforated filter drain. • Silt traps in chambers and gullies will provide suspended particulate matter retention with regular maintenance.
5.249	<p>Any assessment for both the construction and operational phases of the development should describe:</p> <ul style="list-style-type: none"> • the existing quality of waters affected by the proposed project, and how climate change will impact on this • existing water resources affected by the proposed project, the impacts of the proposed project on water resources, and how climate change will impact on this • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas under the Water Framework Regulations and source protection zones around potable 	<p>The existing quality of waters, water resources and physical characteristics of the water environment are described in Chapter 13, Road Drainage and Water Environment of the Environmental Statement (TR010064/APP/6.1).</p> <p>Impacts on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions are assessed in Chapter 13, Road Drainage and Water Environment of the Environmental Statement (TR010064/APP/6.1).</p> <p>Cumulative effects on water environment receptors (for example from contamination and vegetation clearance) are assessed in Chapter 13, Road Drainage and Water Environment of the Environmental Statement (TR010064/APP/6.1).</p> <p>Cumulative effects arising from the Scheme in combination with other reasonably foreseeable developments are assessed in Chapter 15: Assessment of Cumulative Effects of the Environmental Statement (TR010064/APP/6.1).</p> <p>The Environment Agency does not require the Applicant to apply for consent for normal routine maintenance operations, including the application of de-icing agents. In the Memorandum of Understanding (“MoU”) between the Applicant and the Environment Agency (Highways Agency and Environment Agency, 2009) Annex 1 Water Environment it is agreed that prior to the use of de-icing</p>

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	<p>groundwater abstractions; and how climate change will impact on this</p> <ul style="list-style-type: none"> any cumulative effects 	<p>agents other than rock salt, the Applicant should consult with the Environment Agency.</p>
5.250	<p>The assessment should also identify protected areas and other water usages within the vicinity of any discharge, such as bathing waters, abstractions and fisheries at risk from proposed works and the permits/consents required. It should also identify opportunities to improve water quality, for example, through nature-based approaches or solutions, and as part of environmental and biodiversity net gain.</p>	<p>Impacts on water bodies or protected areas under the Water Framework Directive and SPZs) around potable groundwater abstractions are assessed in Chapter 13, Road Drainage and Water Environment of the Environmental Statement (TR010064/APP/6.1).</p> <p>Cumulative effects on water environment receptors (for example from contamination and vegetation clearance) are assessed in Chapter 13, Road Drainage and Water Environment of the Environmental Statement (TR010064/APP/6.1).</p> <p>Cumulative effects arising from the Scheme in combination with other reasonably foreseeable developments are assessed in Chapter 15: Assessment of Cumulative Effects of the Environmental Statement (TR010064/APP/6.1)</p>
<i>Mitigation</i>		
5.251	<p>The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If an applicant needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water company and the Environment Agency.</p>	<p>No new permanent sources of water supply are required by the Scheme.</p>
5.252	<p>The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which are</p>	<p>See the response to paragraph 5.247. Appendix H, Outline Surface Water and Groundwater Management Plan of the First Iteration EMP (TR010064/APP/6.5) sets out the measures to protect the water environment from pollution during construction.</p>

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	over and above any which may form part of the project application) are acceptable. A construction management plan may help codify mitigation.	
5.253	The project should adhere to any National Standards for Sustainable Drainage Systems. The Sustainable Drainage Systems Technical Standards introduced a hierarchical approach to drainage design that promotes the most sustainable approach but recognises feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints.	<p>SuDS drainage will have a service life of 60 years and sufficient capacity to accommodate additional runoff associated with an increase in rainfall intensity due to climate change of 30%.</p> <p>All SuDS and drainage networks will be fully maintained and managed as per standard National Highways guidance and practice in accordance with the SuDS Manual C753 (Construction Industry Research and Information Association ("CIRIA"), 2015a). Requirements for maintenance and management of vegetated drainage systems are described in Appendix 13.7, the Drainage Strategy Report of the Environmental Statement Appendices (TR010064/APP/6.3).</p>
5.254	The project should identify opportunities and secure measures to protect and improve water quality and resources through green and blue infrastructure, sustainable drainage and environmental and biodiversity net gain. This will help to achieve 25 Year Environment Plan objectives and potentially provide greater capacity to support infrastructure needs.	The Scheme includes sustainable infrastructure and biodiversity enhancements as referenced in Appendix 8.12, Biodiversity Net Gain Report of the Environmental Statement Appendices (TR010064/APP/6.3) and referred to in response to draft NPS NN paragraphs 4.35, 5.247 and 5.249.
5.255	The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly. This may also include the	See the response to draft NPS NN paragraph 5.247. Appendix H, Outline Surface Water and Groundwater Management Plan of the First Iteration EMP (TR010064/APP/6.5) sets out the measures to protect the water environment from pollution during construction.

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	need for treatment of water, which may need a permit under the Environmental Permitting Regulations.	<p>A list of all the potential consents/permits/licences which may be required to construct the Scheme are set out in the Consents and Agreements Position Statement (TR010064/APP/3.3). For the water environment, this includes:</p> <ul style="list-style-type: none"> • Agreement to use herbicide in or near water. • S106 Foul sewer connection. • Trade effluent consent. • Environmental Permit Flood Risk Activity (FRAP). • Ordinary Watercourse Consent (temporary or permanent). • Water Abstraction (Temporary / Permanent). • Water Abstraction – Passive dewatering. • Water Transfer (during construction or operation). • Environmental Permit for water discharge.
<i>Decision making</i>		
5.257	The Secretary of State will generally need to give impacts on the water environment more weight where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Regulations.	See the response to draft NPS NN paragraph 5.258 below.
5.258	The Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Regulations. The specific objectives for particular river basins are set out in River Basin Management Plans. In terms of Water Framework Regulations compliance, the overall aim of projects should be to meet the environmental objectives under regulation	<p>Appendix 13.1: Water Framework Directive Compliance Assessment Report of the Environmental Statement Appendices (TR/010064/APP/6.3) determines the Scheme compliance with the Water Framework Directive and its daughter directives ensuring that the Scheme does not cause deterioration of a surface water or ground water body and supports the achievement of environmental objectives set out in the North West River Basin District River Basin Management Plan.</p> <p>Through the assessment stages outlined in Appendix 13.1: Water Framework Directive Compliance Assessment Report of the Environmental Statement</p>

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	13 and to avoiding derogation by use of regulation 19 of the Water Framework Regulations. The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans, Shoreline or Estuary Management Plans and Marine Plans.	Appendices (TR/010064/APP/6.3) it is considered that the Scheme will be compliant with the Water Framework Regulations for all designated water bodies assessed. Through the implementation of mitigation measures during construction and operation, any adverse impacts are unlikely to lead to deterioration in classification and/or prevent the water quality elements from either achieving good classification or achieving their River Basin Management Plan objectives.
5.259	The Secretary of State should consider whether appropriate requirements should be attached to any development consent and/or planning obligations to mitigate adverse effects on the water environment. This should involve discussions with the Environment Agency.	Schedule 9 of the draft Development Consent Order (TR010064/APP/3.1) includes Protective Provisions for United Utilities to prevent damage, interference or pollution to the potable water network. The Consultation Report (TR010064/APP/5.1) sets out the engagement that has taken place to date with BMBC (as the Local Lead Flood Authority) and the Environment Agency. Statements of Common Ground with BMBC and the Environment Agency will be prepared and submitted during the course of the Examination.
Impacts on transport networks		
<i>Applicant's assessment</i>		
5.262	Applicants should consult the relevant highway authority, local planning authority, and Network Rail, as appropriate, on the assessment of transport impacts. This should include agreement on alignment to policies outlined in existing or emerging local plans and Local Transport Plans.	The Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes sets out that Manchester City Council consider that the Scheme aligns with the objectives of the Greater Manchester Transport Strategy. The Case for the Scheme (TR010064/APP/7.1) assesses the Scheme against the policies of the Local Development Plan, including the Bury UDP and the emerging Places for Everyone.

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5.263 – 5.264	<p>Different transport networks may need to share space within an area, even whilst serving different travel needs. For example, bus lanes, shared cycle lanes, green lanes, or bus and rail routes on the same corridor.</p> <p>Applicants should seek to offer an integrated transport outcome, significantly considering opportunities to support other sustainable transport modes, as well as improving local connectivity and accessibility in developing infrastructure. The needs of pedestrian and other vulnerable road users should be considered, where appropriate, in line with the principles of the road user hierarchy.</p>	<p>The Streets, Rights of Way and Access Plans (TR010064/APP/2.5) show how PRoWs, permissive paths, local roads and private means of access will be maintained.</p>
5.265	<p>The applicant should provide evidence that as part of the project they have addressed any new or existing severance issues and/or safety concerns that act as a barrier to non-motorised users, unless it is unsafe or unviable to do so.</p>	<p>Chapter 12, Population and Human Health of the ES (TR010064/APP/6.1) sets out that the Scheme will not cause any new severance. The magnitude of health impacts related to community severance is assessed as negligible negative.</p>
5.267	<p>For road and rail developments, the applicant's assessment should include an assessment of the transport impacts on other networks as part of the application, based on discussions with the Local Highway Authority/Local Planning Authority.</p>	<p>The Transport Assessment (TR010064/APP/7.4) provides details of the likely transport impacts of the operation of the Scheme on the wider road network). Chapter 4 of the Case for the Scheme (TR010064/APP/7.1) also includes an assessment.</p>

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<i>Mitigation</i>		
5.272	Mitigation measures for schemes should be proportionate and reasonable, focussed on facilitating journeys by active travel, public transport, and cleaner fuels.	The Scheme does not give rise to any adverse effects for WCH . Whilst the Scheme does not directly benefit public transport, it will improve journey reliability for any coach, taxi or minibus travel through the Scheme. Cleaner fuels are anticipated over time as technology develops.
5.273 – 5.274	Where development would worsen accessibility, there is a strong expectation that such impacts should be mitigated. Where impacts cannot be mitigated, the applicant is required to provide reasoning as to why impacts cannot be mitigated. The applicant should provide evidence that the development improves the operation of the network and assists with capacity issues.	This is covered in the response to draft NPS NN paragraph 4.3. The Scheme will improve accessibility.
<i>Road and rail developments</i>		
5.275	Mitigation measures may relate to the design, lay-out or operation of the scheme, or any support or funding to the immediate surrounding area of the scheme.	All mitigation measures are included as part of the Scheme and within the Order Limits.
<i>Decision making</i>		
5.277 – 5.278	The Examining Authority and the Secretary of State should give due consideration to impacts on local transport networks and policies set out in existing and emerging	An assessment of the conformity of the Scheme with the development plan, which consists of the Bury Unitary Development Plan and the emerging Places for Everyone, is included in the Case for the Scheme (TR010064/APP/7.1). The Consultation Report (TR010064/APP/5.1) and Consultation Report Annexes (TR010064/APP/5.2) sets out that Manchester City Council consider that the

Draft NPS Paragraph Number	Requirement of the draft NPS NN	Compliance with the draft NPS NN
	<p>local plans and Local Transport Plans, during both construction and operation.</p> <p>Consideration should also be given to whether the applicant has maximised opportunities to allow for journeys associated with the development to be undertaken via sustainable modes.</p>	<p>Scheme aligns with the objectives of the Greater Manchester Transport Strategy.</p>
5.279	<p>Schemes should be developed, and options considered, in the light of relevant policies and plans, both national and local, taking into account local models where appropriate.</p>	<p>The Transport Assessment (TR010064/APP/7.4) provides detail of likely transport impacts of the operation of the Scheme on the wider road network.</p>
5.280	<p>Where a development negatively impacts on surrounding transport infrastructure including connecting transport networks, the Secretary of State should ensure that the applicant has taken reasonable steps to mitigate these impacts. This could include the applicant increasing the project's scope to avoid impacts on surrounding transport infrastructure and providing resilience on the wider network. In particular, this should recognise the importance of providing adequate lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. The applicant may increase the project's scope to avoid impacts on the surrounding transport infrastructure and improve network resilience. Where the proposed mitigation measures are insufficient to reduce the</p>	<p>The Transport Assessment (TR010064/APP/7.4) provides details of likely transport impacts of the operation of the Scheme on the SRN and the wider road network.</p> <p>As the Scheme increases forecast capacity in the vicinity of M60 Junction 18, there is transfer of traffic from some of the local minor roads and some A-roads onto the mainline indicating quicker journey times with the Scheme in place. However, a few local A roads, particularly A576 West of M60 Junction 19 and A56 South of Junction 17, see an increase in traffic demand as more traffic accesses the M60 in this area.</p> <p>The Scheme will not have any negative impacts on the surrounding road network and give rise to some benefits in terms of reducing congestion on the local road network.</p> <p>As the Scheme is to upgrade part of the existing motorway network, no additional lorry parking facilities are proposed as part of the Scheme.</p>

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	<p>impact on the transport infrastructure to acceptable levels, the Secretary of State should expect applicants to accept requirements and/or obligations to fund infrastructure or mitigate adverse impacts on transport networks.</p>	
5.281	<p>Provided that the applicant is willing to commit to transport planning obligations and to mitigate transport impacts identified in the Transport Appraisal Guidance Transport Assessment (including environment and social impacts), with attribution of costs calculated in accordance with the Department's guidance, then development consent should not be withheld. Where residual effects on the surrounding transport infrastructure remain, appropriately limited weight should be given.</p>	<p>There are no disbenefits for surrounding infrastructure as a result of the Scheme.</p>