M60/M62/M66 Simister Island Interchange

TR010064

7.13 APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

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M60/M62/M66 Simister Island Interchange

Development Consent Order 202[ ]

APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

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1. Introduction

1.1.1. The Development Consent Order (DCO) application for the M60/M62/M66 Simister Island Interchange (the "Scheme") was submitted on 2nd April 2024 and accepted for Examination on 30th April 2024.

1.1.2. The purpose of this document is to set out the Applicant's responses to the Relevant Representations (RRs) received from Interested Parties in Summer 2024. These RRs were published on the Planning Inspectorate website on 12th July 2024.

1.1.3. A total of 58 responses were received during the RR period, with two additional responses having been accepted at the discretion of the Examining Authority (ExA) on 3rd September 2024.

1.1.4. **Table 1-1** contains a full schedule of the Applicant's responses.

Table 1-1 - Applicant's Responses to the Relevant Representations (RR)

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
RR-001 - Bury Council		
RR-001	*This communication is in response to the invitation to 'Register to have your say about a national infrastructure project'. Bury Council as the host authority to the project has been involved in the consultation exercise for the project and throughout the drafting of the proposals, it has made various points for consideration on the scheme. Bury Council is preparing a Statement of Common Ground and a Local Impact Report to consider and comment on likely impacts of the proposed development and those other matters to which the Council is in agreement with National Highways on the project. A list of key officers will be submitted following the confirmation of the dates for the hearings in due course.*	The Applicant confirms that a Statement of Common Ground with Bury Metropolitan Borough Council is being prepared and will be submitted to the Examining Authority during the examination. The Applicant notes that Bury Metropolitan Borough Council are preparing a Local Impact Report.
RR-002 - Cadent Gas		
RR-002	*Representation by Cadent Gas Limited (Cadent) to the M60/M62/M66 Simister Island Development Consent Orders (DCO) Cadent is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central, East Anglian and North West England. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient, and coordinated way. Cadent wishes to make a relevant representation to the DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted. The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has gas pipelines and associated apparatus located within the order limits which are affected by works proposed, the extent to which is still being assessed and which may require diversions subject to the impact. At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements. Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise. This is a fundamental matter of health and safety. At this stage, Cadent is not satisfied that the tests under section 127 of the PA 2008 can be*	**T**he Applicant has included protective provisions in the draft Development Consent Order [PD1-005] in favour of Cadent Gas, which utilise the form that has been incorporated into other made Development Consent Orders (DCOs). The Applicant is in correspondence with the solicitors acting for Cadent Gas with a view to agreeing the form of wording before the end of the examination period. The Applicant has had ongoing engagement with Cadent throughout the pre-application stage of the Scheme. The Applicant has undertaken preliminary enquiries which were responded to by Cadent. Draft schemes and budget estimates were requested by the Applicant and responded to by Cadent in May 2023. The Applicant has undertaken an assessment on the impact of the Scheme on the Cadent infrastructure. Joint discussions were held between the Applicant and Cadent during the draft schemes and budget estimate development. The Applicants assessment shows that there are two Cadent gas assets that are in close proximity to the works and these include a 406mm steel high pressure mains that crosses the M66 between Junction 3 and Junction 4 and a 90mm polyethylene low pressure mains located on Balmoral Avenue. The Scheme design shows the installation of a new gantry in close proximity to the 406mm steel high pressure mains. To address this interface, the gantry has been relocated at an off set of 25m from the low pressure mains, which adheres to 'The Specification for Safe Working in Vicinity of Cadent Assets' (CAD/SP/SSW/22). CAD/SP/SSW/22 was supplied to the Applicant during earlier engagement with plant protection officers. As the Scheme design has been amended to align with CAD/SP/SSW/22 the Applicant does not interfere with the land or rights surrounding this asset. The Scheme design shows the interaction with the 90mm polyethylene low pressure mains located on Balmoral Avenue. A budget cost for diverting the affected main was requested by the Applicant. Cadent responded to the budget cost with details of the proposed diversion routes. The draft Development Consent Order [PD1-005] includes temporary land and rights as shown at Plots 1/5ah, 1/5ag, 1/7, 1/5av and 1/5aw on the Land Plans [AS-005] required to accommodate the diversion based on the budget cost and details of the proposed diversion routes.

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
	met. Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed but are in discussion between parties. Cadent wishes to reserve the right to make further representations as part of the examination process but will seek to engage with the promoter to reach a satisfactory agreement.	
RR-003 - Climate Emergency Planning and Policy		
RR-003	*Dr Andrew Boswell, Climate Emergency Planning and Policy Independent environmental consultant specialising in climate science, policy, and law. The environmental statement for the scheme, including Chapter 14 on Climate Change, does not identify and describe : - the full science-based impacts of the development on the global climate system - a "worst case" description of the likely significant impacts - the impacts on meeting the UK's commitments under the Paris agreement - the impacts on the delivery the UK Climate plan ("the Carbon Budget Delivery Plan")*	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) require a decision maker to assess the likely significant effects of a scheme in "an appropriate manner". The assessment methodology to adopt when considering the likely significance of an effect is a matter of judgment for the Secretary of State that is only challengeable on rationality grounds. In R(Boswell) v Secretary of State for Transport [2024] EWCA Civ 145 the Court of Appeal found that the Secretary of State had acted rationally in adopting the Design Manual for Roads and Bridges (DMRB) methodology utilised by the Applicant to identify and assess the likely significant effects of proposed highway DCO schemes on the climate. The judgment of the Court of Appeal records that: *"It is important to appreciate that no challenge is now made [by Dr Boswell] to the methodology that was used in each case to quantify the likely increase in carbon emissions that would be generated by the relevant Scheme, both viewed in isolation and when taken in combination with emissions from other selected sources"* (para 17). Dr Boswell's advocate confirmed for Dr Boswell that: *"it was accepted it was in principle open to the Secretary of State to satisfy the requirements in the EIA Regulations for an assessment of the GHG emissions from each [of the relevant DCO schemes] by means of a comparison between the probable future emissions from the relevant Affected Road Network on the Do Minimum basis and the Do Something basis, with the resulting figures then being compared with the fourth, fifth and sixth national carbon budgets down to 2037"* (para 48). In accordance with the EIA Regulations, the environmental statement provides clear, concise information to support the Secretary of State in reaching a reasoned conclusion on the likely effects of the Scheme on the environment based on current knowledge and established methods of assessment, It is neither necessary or feasible to estimate the impact of changes in greenhouse gas (GHG) emissions associated with a particular development or project on the global climate system. The changes in GHG emissions presented in Chapter 14 Climate of the Environmental Statement [APP-053] (i.e. the impacts of the Scheme on climate) can be considered to be conservative (that is, they present a greater than "worst case"), for the following reasons: • The assessment applied a contingency factor of 15% to the material quantities used to estimate embodied carbon emissions to account for uncertainty in material quantities and to provide a more conservative assessment.

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		• The road user GHG emissions estimated presented in Chapter 14 Climate of the Environmental Statement [APP-053] were produced using emission factors derived from Version 11.0 of Defra's Emission Factors Toolkit (EFTv11). Whilst these emission factors accounted for the latest vehicle composition projections available at that time, they did not account for the impact of policies within the Transport Decarbonisation Plan, for example, which was published by the Department for Transport in 2021. As such, the proportion of cars and LGVs within EFTv11 which were projected to be electric in future years (and therefore have zero GHG exhaust emissions) are much lower than more recent projections (for example those within the latest version of the Transport Analysis Guidance (TAG) data book (v1.23)). • No allowance has been made for the impact of the potential carbon reduction opportunities identified in paragraph 14.9.12 of Chapter 14 Climate of the Environmental Statement [APP-053], which are currently being investigated as part of the ongoing carbon management process. • Embodied carbon emissions associated with raw materials have been estimated using the National Highways Carbon Tool Version 2.5. This tool contains embodied carbon factors derived from the Inventory of Carbon and Energy Version 3.0 (also known as the ICE V3 database), which were published in 2019. No allowance has therefore been made for any decarbonisation of material manufacturing industries (e.g. the steel and cement industries) since this point, or which is likely to occur in the future as a result of government policy (e.g. the UK Industrial Decarbonisation Strategy). The UK has set a legally binding GHG reduction target for 2050, with interim five-yearly carbon budgets and a Nationally Determined Contribution (set in line with Article 4 of the Paris Agreement) which define a trajectory towards net zero. The 2050 target (and interim budgets and Nationally Determined Contribution set to date) are, according to the Climate Change Committee, compatible with the required magnitude and rate of GHG emissions reductions required in the UK to meet the goals of the Paris Agreement. As stated in paragraph 5.39 of the National Planning Statement for National Networks (NPS NN) designated in May 2024 "*Where an applicant assesses the carbon impacts of its scheme against carbon budget 6, and later carbon budgets, it is to be taken also to have assessed the carbon impacts of the scheme against the net zero target in the Climate Change Act 2008, as they are in line with this target*". On the basis of the above, the assessment presented in Section 14.10 of Chapter 14 Climate of the Environmental Statement [APP-053] provides an assessment of the potential impact of the Scheme on the UK's commitments under the Paris agreement. As stated in paragraph 5.38 of the NPS NN designated in May 2024 "*The Secretary of State for Energy Security and Net Zero regularly assesses whether the UK has sufficient policies and proposals overall to meet the UK carbon budgets, with a view to meeting the net zero target, in line with the duties under section 13 of the Climate Change Act 2008. It would not be feasible or sensible for such an assessment to be done at the time of taking individual development decisions, and there is no legal requirement to do so*". There is therefore no specific policy requirement to consider potential impacts on the delivery of the Carbon Budget Delivery Plan. Instead, and as advised by DMRB LA 114 and the NPS NN, an assessment is required of whether the increase in carbon emissions resulting from the Scheme are so significant that it would have a material impact on the ability of government to achieve its statutory carbon budgets. The results in Table 14.24 of Chapter 14 Climate of the Environmental Statement [APP-053] indicate that estimated changes in GHG emissions as a result of the Scheme are negligible in comparison to relevant UK carbon budgets (i.e. an

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		increase of approximately 0.002%). On this basis, GHG emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are identified as not significant.
RR-004 - Environment Agency		
RR-004a	*The Planning Inspectorate Our Ref: SO/2023/123759/04 Your Ref: TR010064 Date 5 July 2024 Dear Sir/Madam APPLICATION FOR PRE-EXAMINATION - M60/M62/M66 SIMISTER ISLAND RELEVANT REPRESENTATION – DEVELOPMENT CONSENT ORDER (DCO) PRE-EXAMINATION (Ref: TR010064)* *Thank you for the opportunity to provide comments for the M60/M62/M66 SIMISTER ISLAND Development Consent Order (DCO) Pre-Examination (Ref: TR010064) These Relevant Representations contain an overview of the project issues which fall within our remit. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project. We have reviewed the DCO, Environmental Statement (ES) and supporting documents submitted to the Planning Inspectorate as part of the above-mentioned application.* *Summary of Environment Agency position FIRST ITERATION ENVIRONMENTAL MANAGEMENT PLAN We welcome the 1st Iteration Environmental Management Plan and the associated Annexes intended to be produced at the detailed design stage. The EA would like to be consulted on the 2nd iteration Environmental Management Plan for matters within our role and remit.*	The Applicant notes the Environment Agency's comments. The Applicant's response to the comments and the Environment Agency's responding position is set out within the agreed Statement of Common Ground with them [TR010064/APP/7.11] which will be submitted at Examination Deadline 1 (24 September 2024). Engagement with the Environment Agency resulted in the Applicant submitting an amended Requirement 4 of the draft Development Consent Order at Procedural Deadline A. The amendment made makes provision for consultation with the Environment Agency on the Environmental Management Plan on matters relating to their role and remit. The draft Development Consent Order originally submitted has now been superseded, and the relevant examination library reference is [PD1-005].
RR-004b	*Contaminated Land and Groundwater Environmental Statement Chapter 9 – Geology and Soils* *Northern Area* *The drift geology in this area consists of Till Devensian – Diamicton classed as a secondary (undifferentiated) aquifer with local Peat deposits. The glacial Till deposits are classed as a secondary (undifferentiated) aquifer, this has been assigned in cases where it has not been possible to attribute either category A or B to a rock type. In the case of these glacial Tills in this area we are aware that sand bands may exist which can provide a source of water. The investigation has proven groundwater exists within the till, we do not have detailed logs to get further information, but it would be likely that the Till would class as a secondary A aquifer. These deposits are underlain by Pennine Middle Coal Measures - Mudstone, Siltstone and Sandstone. Classed as a Secondary A aquifer these comprise permeable layers that can support local water supplies, and may form an important source of base flow to*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
	rivers.	
RR-004c	*Southern area* *The southern half of the site which will be developed by new road connections bypassing junction 18 of the M60, is underlain again by The glacial Till deposits which are classed as a secondary (undifferentiated) again where sand bands may exist which may be Secondary A or B aquifers. Glaciofluvial Ice Contact Deposits, Devensian - Sand and Gravel and Peat deposits are also present in this area. These are both classed as Secondary A Aquifers. The bedrock in this area is mapped as Chester formation – Sandstone. This is classed as a Principal aquifer. The site investigation has proven a shallow groundwater body in the Till deposits. This is based on the groundwater monitoring data with no access to detailed logs or surveyed in levels. The investigation has proven groundwater exists within the till, we do not have detailed logs to get further information, but it would be likely that the Till would class as a secondary A aquifer. We have limited data for the southern part of the site and in particular the principal aquifer here but it is likely to be highly vulnerable given the context.*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-004d	*Table 4.1 of the groundwater assessment notes where the anticipated maximum excavation depths exceed the anticipated groundwater depths. There is no information on where this is calculated from and further information about this is required which we understand will be provided following further investigation and assessment work. It would appear on a cursory glance with limited information (i.e. no detailed logs with surveyed in levels) that there are two distinct groundwater bodies, one in the shallow superficial deposits and one in the deep bedrock aquifer. While it is unlikely that the deeper groundwater will be impacted there is a high likelihood that the shallow aquifer will be intercepted at several locations. We welcome the acknowledgment to obtain consents and licences for proposed dewatering in these locations if required.*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-004e	*The conceptual models have shown that there are connections with the groundwater dependent terrestrial ecosystems as shown in the report. The HERWAT assessment considered in Appendix 13.2: Water Quality Assessment Report of the Environmental Statement Appendices (TR010064/APP/6.3) does not look at impacts to groundwater. If any changes are made and discharges are to be made to groundwater, then a water quality assessment must be completed in line with the SUDS manual (C753) to determine the risks and mitigations required for groundwater quality. This is especially important because of the presence of nearby groundwater dependent terrestrial ecosystems.*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-004f	*We note under Chapter 9 (Geology and Soils) of the Environmental Statement that there is an intention to produce a Detailed Quantitative Risk Assessment (DQRA) to establish risks of contamination from the proposed development to 'controlled waters'. Following the production*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
	of this report, it will be identified whether remedial works are required. We would advise that the EA would like to be consulted on such details, including additional supplementary investigation works; risk assessment; options appraisal and remedial approach; and validation plan prior to the commencement of development to ensure proposals are appropriate from a 'controlled waters' perspective (i.e. DCO requirement). If remedial works are required, we advise a verification report demonstrating the success of the remediation undertaken is submitted for approval.	
RR-004g	*We also welcome the intention to produce a Piling Risk Assessment to ensure the protection of 'controlled waters' prior to any intrusive foundation / piling works being undertaken. The EA would request this information is submitted for approval prior to piling works being undertaken. We will continue to work with the applicant and their consultants on the Groundwater and Contaminated Land matters raised in our relevant representations. We recommend that developers should:* *• Follow the risk management framework provided in Guidance on Land contamination risk management (LCRM), when dealing with land affected by contamination* *• Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health* *• Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed* *• Refer to the contaminated land pages on gov.uk for more information*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-004h	*All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites.*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-004i	*ENVIRONMENTAL STATEMENT Chapter 13 – Road Drainage and the Water Environment Water Quality* *We welcome the surface water baseline information provided in Chapter 13 of the ES, which identifies several main rivers; ordinary watercourses; minor and unnamed ditches; and other water bodies within the study area. We note in paragraph 13.7.8, the water quality of certain watercourses and waterbodies identified are unknown, whereby receptors are likely to be influenced by a range of sources within its locality (i.e. surrounding land uses; surface water runoff; road drainage; sewerage misconnections; nutrient inputs from agriculture and golf courses; accidental spillages and unlicensed discharges).*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
RR-004j	*We advise surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. We encourage the applicant to seek opportunities to improve water quality discharges as part of their road drainage, where possible.*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-004k	*The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations) and associated Northwest River Basin Management (RBMP) also require that all water bodies are protected from deterioration and pollution whilst advocating the restoration and enhancement of water bodies to promote recovery.*	Please refer to the response provided in the agreed Statement of Common Ground with the Environment Agency [TR010064/APP/7.11].
RR-005 - Friends of Carrington Moss		
RR-005a	*We object to the proposed scheme at Simister Island Interchange. The Government/National Highways should be seeking alternative, more sustainable solutions to reduce demand (ie rail and water-based options), rather than just increasing capacity and promoting even higher volumes of traffic at one of the busiest motorway junctions in the region. Where are the genuinely sustainable alternative options set out? This is a lazy solution to traffic congestion. It is unsustainable and expensive (not just financially but also in terms of citizen health and wellbeing, climate/carbon implications and environmental/ecological harms).*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2, 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network.
RR-005b	*It will result in increased air, dust, noise, light and vibration pollution for communities already experiencing levels that are over legal limits and the consequential health challenges (this area is already within Noise Important Areas and Air Quality Management Areas).* *National Highways should be seeking solutions that will reduce the current harms caused by the existing road, not exacerbating those issues by increasing capacity.*	The Applicant acknowledges the community's concerns around matters such as dust, air, noise and light pollution. Chapter 12 Population and Human Health of the Environmental Statement [APP-051] provides an assessment of the likely significant effects on human health during the construction stage of the Scheme. These are described in paragraphs 12.18.43 to 12.18.58 and includes an assessment of the interaction of these matters on health (moderate negative (significant)). Chapter 12 Population and Human Health of the Environmental Statement [APP-051] also provides an assessment of the effects on human health during the operation stage of the Scheme (paragraphs 12.18.68 to 12.18.101). While the effects on communities overall are assessed as significant during the construction stage, they are not assessed as significant in operation compared to the baseline conditions without the Scheme. In particular, the new highway surfacing to be provided with improved noise reducing properties, has been assessed as significantly positive for human health outcomes as set out in paragraphs 12.18.89 to 12.18.95 and the accompanying Tables 12.36 and 12.37 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment concludes that there would be no significant effects, due to air quality, during construction and operation of the Scheme from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA105 (Air Quality) definitions, which are explained in Chapter 5

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' as set out in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore mitigation measures have been identified and included in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127] which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. 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 Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. It is accepted that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise and vibration assessment of the Scheme and includes consideration of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. The Applicant has identified that due to the junction layout and the short distances between junctions on the M60 all sections of the Scheme will need to either remain lit or will be provided with new lighting in accordance with design standards, specified to mitigate, as far as practicable, light spill from the carriageway. This will include installation of "hoods" on the lights where necessary, which will be reviewed as part of the detailed design of the Scheme. The visual effects from street lighting and from car headlights are addressed as part of the visual impact assessment in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046]. Figure 2.3, the Environmental Masterplan, of the Environmental Statement Figures [APP-057] shows the vegetation which would be reinstated along most sections of the highway boundary. By the design year (year 15 of operation) vegetation would establish to provide a similar level of filtering or screening of carriageway lighting and vehicle headlights as provided before the Scheme. In conclusion, the Scheme would not lead to significant adverse effects on air quality and noise and vibration during operation. The Scheme would lead to beneficial effects on noise at some locations during operation, with new highway surfacing with improved noise reducing properties between J17 and J18 of the M60 leading to an overall reduction in road traffic noise, which is likely to be noticeable for some people, at some residential dwellings depending on location.
RR-005d	*Given Greater Manchester's adopted spatial plan will release more than 2,400 hectares of Green Belt for development, any additional loss of Green Belt for this scheme is not acceptable.*	Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit which have been removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21 hectares of the Order Limits within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the

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		realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limits would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer within the Green Belt following its removal by PfE. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt.
RR-005e	*We understand construction will take place at night (over a three- and a half-year period), causing unacceptable disturbance to local citizens, impacting many vulnerable residents and also extensively affecting those who need a decent night's sleep to be effective in their work place, studies/examinations, including students, who have already suffered significantly because of the pandemic. Nighttime motorway closures will transfer traffic onto the local road network increasing noise and other forms of disturbance for huge numbers of local residents across a wide area surrounding the scheme boundary.*	The Applicant has developed the construction methodology in relation to the current design of the Scheme and the space available on the existing network to undertake the works. The length of the construction programme is driven by the intention to retain the existing number of traffic lanes open on the M60 / M66 / M62 during construction, to minimise the impact on traffic. Maintaining the existing number of lanes on the network will mean there is little available working space during the daytime andthe Applicant will need to introduce night-time closures on the M60 / M66 / M62. The traffic management strategy, which gives an overview of the phases and the required network closures during construction, can be found in the Outline Traffic Management Plan [APP-150]. Detailed in the Outline Traffic Management Plan [APP-150] are the proposed diversion routes that will be utilised during night closures of the M60 / M66 / M62. The Scheme will install temporary accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use the local road network (other than in the early enabling works phase where access would be required from the local road network for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology and the installation of boundary fencing). This will minimise any impact to the local road network. The design development and construction methodology will continue to be refined with the aim of reducing the number of full closures at night and use of diversion routes. The Outline Traffic Management Plan [APP-150] will be developed into the Traffic Management Plan and secured through Requirement 10 of the draft Development Consent Order [PD1-005]. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working, for those receptors closest to the works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] at Appendix B which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains the Register of Environmental Actions and Commitments, which includes measures to reduce noise from construction activities including a commitment to minimise the total number of full carriageway closures that will require the use of traffic diversion routes. Measures to mitigate the impacts of noise and vibration during construction would include

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		using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work, however during the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents.
RR-005f	*We believe the scheme will lead to an increase in fatal, serious and slight casualties, causing additional costs and workload to the NHS at a time when there should be a concerted effort to reduce demand (a benefit that a genuinely sustainable solution would bring).*	The Applicant has undertaken assessments to ensure that the Scheme design has been developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details are available in the Transport Assessment [APP-149].
RR-005g	*There are no significant benefits from this NSIP, only small savings of time and modest economic growth, which results in the scheme being very poor value for money with a Benefit to Cost Ratio of just 1.17 (Low value for money according to the DfT's guidance).*	The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified Benefit to Cost ratio (BCR) of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR.

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		The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024, thissets out up to date statistics for the strategic road network *"In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)."* Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at the Simister Interchange will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following *"This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location."* Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network.
RR-005h	*Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over a 60 year period due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets which we are already off target to reach.*	The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the

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		Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-006 - Historic England		
RR-006	*Historic England (formally "The Historic Buildings and Monuments Commission for England") is the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology, and historic landscape. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. Historic England is an executive non-Departmental public body established by S32 of the National Heritage Act 1983. We answer to Parliament through the Secretary of State for Digital, Culture, Media and Sport. Our primary remit in relation to any application is to advise on the impact of the Project on grade I and II* listed structures, registered parks and gardens, and on scheduled monuments. We would not wish to comment on grade II listed buildings (unless their demolition is proposed) or individual undesignated heritage assets as these are outside the remit of Historic England. We are content to defer to the Local Planning Authorities and their archaeological advisors on matters of local and regional heritage assets, including any Grade II structures, and we refer the Examining Authority to their submissions as relevant. We consider that the assessment of the existing cultural heritage resource contained in the Cultural Heritage Desk Based Assessment (Appendix 6.1 of the Environmental Statement) appears to have been carried out in accordance with current best practice. It appears to have correctly identified the archaeological sites, historic buildings and elements of the historic landscape within the study area covering both the area within the Scheme boundary and in an appropriately defined study area outside it. Chapter 6.1 ('Cultural Heritage') of the ES appears to have identified those elements of the cultural heritage that could potentially be affected by the Scheme. It also appears to have identified areas where further work may be required to confirm the existence or otherwise of archaeological features that might potentially be affected by the construction of the Scheme. Chapter 6 of the ES also suggests measures which would could mitigate the impact of the Scheme on cultural heritage. These include further identification work on identified archaeological assets in advance of construction, and archaeological monitoring of works*	The Applicant acknowledges Historic England's relevant representation and notes that Historic England is content with the commitments given to ensure an appropriate level of mitigation for the Scheme. The Applicant has agreed a Statement of Common Ground (SoCG) with Historic England which confirms this position [TR010064/APP/7.12]. This SoCG will be submitted at Examination Deadline 1 (24 September 2024).

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	('watching brief') during the early stages of construction. Historic England considers this to be an appropriate response to the relatively low level of impact on cultural heritage identified. These measures are secured by commitments recorded in the REAC contained within the first iteration EMP. Further archaeological work in advance of construction is secured by commitment CH1, and an archaeological watching brief during early stage construction by commitment CH2. Requirement 9 of Schedule 2, Part 1 of the Draft DCO further sets out that no part of the authorised development is to commence until for that part a written scheme for the investigation of areas of potential archaeological interest has been submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority. In the opinion of Historic England, the two commitments CH1 and CH2 and Requirement 9 of the Draft DCO, should secure an appropriate level of mitigation for the impact of the Scheme upon cultural heritage.	
RR-007 - Roger Hannah Limited on behalf of Joseph Holt Limited		
RR-007a	*M60/M62/M66 Simister Island Interchange, Development Consent Order, 2024.* *Owner: Joseph Holt Ltd Property: Frigate Public House, Thatch Leach Lane, Manchester M45 6FW* *Plot Numbers: 1/33a & 1/33b We act on behalf of Joseph Holt Ltd in respect to the aforementioned Development Consent Order being promoted by Highways England under the Planning Act 2008.* *We can confirm that our clients wish to make representations relating to the M60/M62/M66 Simister Island Interchange, Development Consent Order, 2024 ('The Order') as currently proposed. We would be grateful if you would accept this letter as a representation in response to your letter to my client dated 20 May 2024. Whilst Joseph Holt Ltd do not oppose the purpose or principle of The Order. Our clients do wish to make representations relating to the design of the scheme and proposed land take. No clear justification has been provided as to why plots 1/33a and 1/33b are required for the purpose of the scheme, nor has have alternative considerations been made. In preparing our Representation we have been mindful of the Statement of Reasons, dated April 2024, set out by National Highways as their justification for the making of the proposed Order. In summary, our representations are as follows:* *1. Purpose of the Acquisition* *In the Statement of Reasons, National Highways have failed to justify why the land falling within our client's ownership is required. There are*	The Applicant confirms that, based on the current Scheme design, the rights of access over the land (plot 1/33b, coloured blue on the Land Plans) [AS-005] belonging to the Frigate Pub are required to facilitate works associated with the verge of the M60 eastbound carriageway. This includes the construction of the new hard shoulder and retaining walls required to support the existing embankment. The Applicant confirms that there will be no temporary access required or construction works taking place within the car park of The Frigate Pub throughout the construction of the Scheme. The blue land (plot 1/33b) as shown on the Land Plans [AS-005] is required for the permanent acquisition of rights for future maintenance only. The Frigate Pub car park therefore will not be directly affected by construction of the Scheme as no permanent acquisition or temporary possession is being sought by the Applicant. Alternative access arrangements have been considered by the Applicant and risk assessed. One option considered was access from the new hard shoulder on the M60 eastbound but this option has been discounted, having regard to the Applicant's standard methods for accessing their infrastructure for maintenance, due to the provision of a new retaining wall which will be installed at the toe of the amended cut slope and will severely restrict safe pedestrian access. A new access/layby to the north-west of Sandgate Road overbridge has also been considered and discounted, principally due to visibility constraints for northbound vehicles on Sandgate Road and vehicles wishing to exit from the layby. Finally, use of the new maintenance layby to be installed adjacent to the M60 westbound carriageway, south east of Sandgate Bridge in plot 1/1k (as shown on the Land Plans [AS-005] and adjacent to land owned by Bury Metropolitan Borough Council, as illustrated by plot 1/34 on the Land Plans [AS-005] would require a walking distance to the new gantry and telecommunications site near the Frigate Public House, in excess of 450m. It is considered that this distance is excessive when operatives will be carrying equipment and tools. The Statement of Reasons [APP-018], including Annex A of that document, fully justifies the requirement for acquisition of the necessary interests in each plot as shown on the Land Plans [AS-005] with reference to the Works Plans [AS-006] and Schedule 1 of the draft Development Consent Order [PD1-005] to enable the Scheme to be carried out and thereafter to be operated and maintained.

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	two parcels of land within our client's interest to be acquired: - Parcel 1/33a is to be acquired on a temporary basis – Parcel 1/33b is to be acquired on a temporary basis with a permanent acquisition of access rights. Appendix A of the Statement of Reasons fails to detail the justification for the acquisition of each land parcel. The justification relating to our client's land however relates to the wider works to be carried out on this strip of road (within Sheet 1 of the associated plans), detailing the construction or alteration of portal and cantilever gantries. Appendix A does not provide specific justification as to why our client's land is required for the purpose of the scheme. With reference to the Work Plans (2024) below, the proposed cantilever gantry is positioned below our client's land ownership, and it is not clear as to why plots 1/33a and 1/33b are required to facilitate the construction of the gantry. Plot 1/33a sits just above Highway's own landholding whilst plot 1/33b is located further back from the motorway network. There is no clear reason why the acquisition of these land parcels should be required for the construction or alteration of gantries. We do however note the M60/M62/M66 Simister Island Interchange - map book 2 - land use plans, July 2023 describes the need for the land take as: "Land located within the Frigate Pub car park and land south of Frigate Pub car park, north of the M60 eastbound and west of Sandgate Road. Land required under a combination of permanent acquisition and 'temporary possession and permanent acquisition of rights' to allow access to existing motorway communication and technology cabinets located north of the M60 eastbound. These cabinets are presently accessed via the hard shoulder of the M60 eastbound, but a new retaining wall is to be constructed in this location which will result in this method of access no longer being safe for maintenance operatives. Additionally, it is worth noting that the permanent acquisition shown is our existing land." With reference to the Land Plans (2024) below, National Highways' existing land ownership (highlighted pink) contains the above-mentioned technology cabinets. There is therefore no clear justification why Joseph Holt's land is required for access, when the scheme can simply be amended to provide safe access to the cabinets via National Highways' own landholding. This point is discussed further Section 2 of this letter. The permanent access rights sought represent the primary issue of concern for my client. The requirement for access only proposes justification for the permanent acquisition rights over plot 1/33b (blue land). There have been no justifications provided as to why the temporary acquisition of either plot is required for the purpose of the scheme. Alternative arrangements can be made which would avoid these permanent rights being taken which would have the positive effect of reducing interference in land ownership and National Highways own compensation burden. Section 5.2 of the Statement of Reasons sets out the statutory obligations of the Applicant. The CA Guidance (paragraph 11) states "In respect of whether the land is required to facilitate or is incidental to the proposed development, the Secretary of	

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	State will need to be satisfied that the development could only be carried out to a satisfactory standard if the land in question were to be compulsorily acquired and that the land to be taken is no more than is reasonably necessary for that purpose and that it is proportionate." Highways England have provided no justification as to why the land is required for the development to be carried out to a satisfactory standard. This has not been provided for either the permanent acquisition of access rights nor the temporary loss of land. Furthermore, the extent of land taken within Joseph Holt Ltd's ownership is not proportionate to the purpose of the construction of a cantilever gantry nor providing access. The proposed acquisition will result in the temporary loss of a significant portion of the car park land and would have an adverse impact on the viability of the business and future ownership plans. The interference in private ownership rights is wholly disproportionate and needs to be reviewed. The Order should be amended to exclude the land ownership of Joseph Holt (Plot 1/33a and Plot 1/33b) and at a minimum exclude the permanent land acquisition.	
RR-007b	*2. Consideration of Alternatives* *Section 5.2.5 of the Statement of Reasons refers to Paragraphs 8 to 10 of the CA Guidance, stating that "all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored.". As discussed above, it has been proposed that Joseph Holt's land is required for access purposes. However, with reference to the plans above, there are clear alterative access options which have not been considered. We would consider that safe access can be provided from the M60 by the maintenance of the proposed scheme or through alteration. The design of a road scheme should incorporate means of access to technology cabinets without requiring the acquisition of neighboring land. Furthermore, National Highways' land ownership spans from Sandgate Road, to the east, providing direct access to the technology cabinets. National Highways are requested to fully investigate whether alternative access can be facilitated from Sandgate Road. As stated in Section 5.3.5 of the Statement of Reasons, all reasonable alternatives to compulsory acquisition should first be explored. National Highways are requested to demonstrate why access cannot be obtained from their own existing land holding or via Sandgate Road.*	Alternative access arrangements have been considered by the Applicant and risk assessed. One option considered was access from the new hard shoulder on the M60 eastbound but this option has been discounted, having regard to the Applicant's standard methods for accessing their infrastructure for maintenance, due to the provision of a new retaining wall which will be installed at the toe of the amended cut slope and will severely restrict safe pedestrian access. A new access/layby to the north-west of Sandgate Road overbridge has also been considered and discounted, principally due to visibility constraints for northbound vehicles on Sandgate Road and vehicles wishing to exit from the layby. Finally, use of the new maintenance layby to be installed adjacent to the M60 westbound carriageway, south east of Sandgate Bridge in plot 1/1k (as shown on the Land Plans [AS-005] and adjacent to land owned by Bury Metropolitan Borough Council, as illustrated by plot 1/34 on the Land Plans [AS-005] would require a walking distance to the new gantry and telecommunications site near the Frigate Public House, in excess of 450m. It is considered that this distance is excessive when operatives will be carrying equipment and tools.
RR-007c	*3. Public Interest* *Section 5.4.1 of the Statement of Reasons states that the compulsory acquisition must be "proportionate and in the public interest by reducing environmental impacts, minimising costs to the Applicant (and hence the public purse) and mitigating the impact on land interests". National Highways have not adhered to this on two accounts. The first being that the costs are not being minimised through the compulsory acquisition of rights over the Joseph Holt land. As discussed above the impact of the temporary loss of car park land would have a significant impact on the*	The Applicant confirms that plot 1/33b as shown on the Land Plans [AS-005] is only required for permanent rights for future maintenance access. This access will likely be infrequent and ad-hoc. The Applicant is not seeking permanent acquisition or temporary possession of this land and will not use this land for construction of the Scheme. As such it is not considered that there will be any "temporary loss" of the car park. Pursuing permanent rights over this land is more cost effective than constructing new infrastructure given that the access already exists for purposes of maintaining the telecommunications mast south of the Frigate Public House. Having to construct new infrastructure either adjacent to Sandgate Road or from the M60 eastbound carriageway, would be more expensive to the public purse than utilising existing infrastructure and hardstanding areas that maintenance vehicles can

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	viability of the business, and the compensation claim put forward by Joseph Holt will reflect this. Given that there is no clear justification why the land is required for the scheme, and alternative, cheaper options are possible, it is not a proportionate use of public spending. Secondly, National Highways have not mitigated the impact on land interests. Sections 1 and 2 of this letter clearly demonstrate that there is no clear need for the acquisition of the land on a temporary basis and that there are clear alternatives to provide access. Therefore, the impact on Joseph Holt's land has not been mitigated.	use. Construction of new infrastructure also has a greater environmental and carbon impact than utilising existing infrastructure. Furthermore, removing maintenance vehicles from the hard shoulder sits within the realm of wider operational safety benefit for motorists by removing temporary hazards (i.e. parked maintenance vehicles), from the hard shoulder.
RR-007d	*4. Human Rights* *It is our considered opinion that the proposed Order is also an infringement of our client's human rights under the Human Rights Act 1998. The Secretary of State must consider whether, on balance, the case for compulsory purchase justifies interfering with the human rights of the owners and occupiers of the Order land. As correctly pointed out in Paragraph 6.2.4 of the Statement of Reasons, the Secretary of State has to be satisfied that the DCO's infringement on human rights is proportionate and otherwise justified. The purpose of the scheme can be achieved without the compulsory acquisition of our client's land and as such, there is inadequate justification for interfering with the human rights of the owner. A balance has not been struck between the individual rights and the wider public interest.*	The Applicant is content that the permanent rights sought over plot 1/33b at the Frigate Public House as shown on the Land Plans [AS-005] are proportionate and justified as set out in paragraph 6.5.1 of the Statement of Reasons [APP-018]. The Applicant has sought to minimise the land-take required across the Scheme including at the Frigate Public House which is demonstrated through the Applicant seeking permanent rights only for future maintenance access for the Scheme rather than seeking to compulsorily acquire the land on a permanent basis. Again, the Applicant confirms that, in respect of plot 1/33b, no temporary land take is required, and the Applicant is seeking permanent rights for access in connection with future maintenance of the Scheme only.
RR-007e	*5. Conclusion* *In conclusion, Joseph Holt Ltd are supportive of the delivery of the proposed M60/M62/M66 Simister Island Interchange scheme but they are concerned that the proposed temporary land take and the permanent acquisition of access rights, which affects their interests, has not been fully thought through. National Highways have demonstrated a lack of consideration for the requirement of the temporary land take of plots 1/33a and 1/33b whilst also failing to consider alternative options for access to the technology cabinets. They have not demonstrated that there is a compelling case in the public interest which justifies the compulsory acquisition of the Joseph Holt land. On this basis, it is Joseph Holt's view that the Order in its current state should not be confirmed by the Secretary of State.* *Yours faithfully, Simon Cook BSc (Hons) MRICS Managing Director For and on behalf of ROGER HANNAH Direct line: [REDACTED] Email: [REDACTED]*	The Applicant has addressed these points in the responses given above.
RR-008 - National Grid Electricity Transmission		
RR-008	*Relevant Representation of NGET (National Grid Electricity Transmission Plc) in respect of the M60/M62/M66 Simister Island DCO (the "Project") This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") in respect of the*	The Applicant has included protective provisions in the draft Development Consent Order [PD1-005] in favour of electricity undertakers. The Applicant is however in correspondence with the solicitors acting for NGET with a view to agreeing the form of wording.

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	Project, and in particular NGET's existing and proposed infrastructure and land interests which will be located within and in close proximity to the proposed Order Limits. The Project proposes to construct a free-flow link from the M60 eastbound to southbound carriageway, realign M66 southbound carriageway, construct a two-way free-flow road from M60 northbound to westbound, widen the M66 and other associated works. The Applicant is seeking temporary and permanent rights over several parcels which contain NGET assets, including 1/1c, 1/3c, 1/3d, 1/3e, 1/5a, 1/5c, 1/5d, 1/5e, 1/5f, 1/5h, 1/5ap, 1/5at, 1/5ay, 1/5az, 1/5aaf, 1/9, 1/34, 2/3b, 2/3c, 3/1a, 3/2a and 3/4. The Applicant is also seeking permanent or temporary rights over parcels which contain rights held by NGET to maintain their assets included within sheets 1-3 of the Land Plans. As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. Additionally, NGET must protect its future proposed infrastructure. NGET will therefore require appropriate protection for retained or proposed apparatus, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights. NGET owns and operates a 275kV overhead line that is located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows: • VJ 275kV OHL – Kearsley – Whitegate 1; Kearsley – Whitegate 2 • Associated cable fibres Protection of NGET Assets NGET will require Protective Provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that assets existing at the time of construction of the Project are adequately protected and to ensure compliance with relevant safety standards. NGET is in the early stages of liaising with the Applicant in relation to such Protective Provisions. Accordingly NGET has not appended the version of the Protective Provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, if not agreed between the parties by that point, with an explanation of any outstanding issues. NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with facilitating all	The Applicant has had ongoing engagement with NGET throughout the pre-application stage of the Scheme. The Applicant has supplied NGET with an analysis of the interface with their infrastructure and the Scheme. The Scheme will upgrade the infrastructure between the M60 Junction 19 and M60 Junction 17 which would have construction plant interface with the overhead lines between pylons VJ27 and VJ19. The NGET asset protection team confirmed that the works are acceptable in proximity to the pylons and overhead lines. The Applicant will continue engagement with NGET asset protection team throughout the detailed design to ensure that there is adequate protection for existing assets and compliance with relevant safety standards. The majority of plots listed by NGET can be found on sheet 1 of the Land Plans [AS-005] and are plots subject to temporary possession for the purposes of diverting statutory undertaker apparatus and comprise the public highway in the ownership of the Applicant or Bury Metropolitan Borough Council. NGET interests in this area are in respect of overhead cables. NGET own the freehold over Plot 1/9 which is subject to temporary possession for the purposes of access during construction to carry out widening of the M60 westbound carriageway. A new permanent right of access is required across Plot 1/34 for the purposes of maintenance during the operation of the Scheme. No physical works are proposed under the overhead cables for which NGET have rights over plot 1/34. The plots listed by NGET which can be found of sheets 2 and 3 of the Land Plans [AS-005] comprise farmland where the Applicant will construct new drainage and environmental features. NGET have rights in respect of overhead cables across these plots. In all cases, the physical works proposed in these areas have been subject to the analysis referred to earlier in this response. The Applicant's position is that suitable protection is provided by the draft Development Consent Order [PD1-005] and there is no adverse effect on NGETs current or future statutory obligations.

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	future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. Compulsory Acquisition Powers in respect of the Project Where the Applicant seeks powers of compulsory acquisition over NGET land or rights, the Protective Provisions must require that the Applicant obtain NGET's consent to any compulsory acquisition of any such land or rights. NGET reserves the right to make further representations as part of the Examination process in relation to any NGET projects identified during the Examination process, and as negotiations continue.	
RR-009 - Natural England		
RR-009	***1. Summary and conclusions of Natural England's advice*** *1.1 Natural England's advice in these relevant representations is based on information submitted by the National Highways in support of its application for a Development Consent Order ('DCO') in relation to the M60/M62/M66 Simister Island Interchange ('the project'). which includes a construction of a new loop road (the 'Northern Loop') to provide a new link between the M60 eastbound to the M60 southbound, widening of the M66 southbound through J18, widening of the existing M60 northbound to M60 westbound link road, realignment of the M66 southbound slip road to M60 J18, conversion of the hard shoulder along the existing four-lane controlled Motorway between M60 J17 to J18, construction of a new hard shoulder on the M60 between J17 and J1 and renewal of signs and signals.* *1.2 Table 1 found in Appendix A on page 4 of this letter summarises what Natural England considers the main issues to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. Natural England may have further or additional points to make, particularly if further information about the project becomes available.* *1.3 Where there are specific comments to make these are set out against the following subheadings which represent our key areas of remit:* • *Internationally designated sites* • *Nationally designated sites* • *Protected species* • *Biodiversity net gain* • *Soils and best and most versatile agricultural land* • *Ancient woodland and ancient/veteran trees*	The Applicant notes Natural England's comments. The Applicant's response to the comments and Natural England's responding position is set out within the agreed Statement of Common Ground with Natural England [TR010064/APP/7.10]. This SoCG will be submitted at Examination Deadline 1 (24 September 2024).

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	1.4 Our comments are flagged as red, amber or green: • *Red are those where there are fundamental concerns which it may not be possible to overcome in their current form.* • *Amber are those where further information is required to determine the effects of the project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy.* 1. *Green are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured).* *1.5 Natural England has worked successfully with National Highways to provide advice and guidance since July 2023, and there are no substantive outstanding matters.* *1.6 Natural England has commenced engagement with the applicant's consultants on a statement of common ground (SoCG), which we expect to receive in due course, and expects to continue discussions with the applicant.* ***2. Natural England's overall conclusions*** *2.1 Natural England is satisfied that the project is unlikely to have a significant impact on the nearly internationally and nationally designated sites, deep peaty soils, ancient woodland and ancient/veteran trees and and all protected species issues (including any licensing requirements under the Habitats Regulations or the 1981 Act) have been addressed.* *2.2 Overall its Natural England's advice, based on the information provided, is that in relation to identified nature conservation issues within its remit there is no fundamental reason of principle why the project should not be permitted.*	
RR-010 - SALE CIVIC SOCIETY		
RR-010	*Sale Civic Society objection: We object to the proposed scheme at Simister Island Interchange. The Government/National Highways should be seeking alternative, more sustainable solutions to reduce demand (ie rail and water-based options), rather than just increasing capacity and promoting even higher volumes of traffic at one of the busiest motorway junctions in the region. Where are the genuinely sustainable alternative options set out? This is a lazy solution to traffic congestion. It is unsustainable and expensive (not just financially but also in terms of citizen health and wellbeing, climate/carbon implications and environmental/ecological harms).*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail,

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	It will result in increased air, dust, noise, light and vibration pollution for communities already experiencing levels that are over legal limits and the consequential health challenges (this area is already within Noise Important Areas and Air Quality Management Areas). National Highways should be seeking solutions that will reduce the current harms caused by the existing road, not exacerbating those issues by increasing capacity. Given Greater Manchester's adopted spatial plan will release more than 2,400 hectares of Green Belt for development, any additional loss of Green Belt for this scheme is not acceptable. *We understand construction will take place at night (over a three- and a half-year period), causing unacceptable disturbance to local citizens, impacting many vulnerable residents and also extensively affecting those who need a decent night's sleep to be effective in their workplace, studies/examinations, including students, who have already suffered significantly because of the pandemic. Nighttime motorway closures will transfer traffic onto the local road network increasing noise and other forms of disturbance for huge numbers of local residents across a wide area surrounding the scheme boundary.* *We believe the scheme will lead to an increase in fatal, serious and slight casualties, causing additional costs and workload to the NHS at a time when there should be a concerted effort to reduce demand (a benefit that a genuinely sustainable solution would bring).* *There are no significant benefits from this NSIP, only small savings of time and modest economic growth, which results in the scheme being very poor value for money with a Benefit to Cost Ratio of just 1.17 (Low value for money according to the DfT's guidance).* *Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over a 60 year period due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets which we are already off target to reach. Michael Riley For SALE CIVIC SOCIETY Tel: [REDACTED] Email: [REDACTED]*	buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. The Applicant acknowledges the community's concerns around matters such as dust, air, noise and light pollution. Chapter 12 Population and Human Health of the Environmental Statement [APP-051] provides an assessment of the likely significant effects on human health during the construction stage of the Scheme. These are described in paragraphs 12.18.43 to 12.18.58 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051] and includes an assessment of the interaction of these matters on health (moderate negative (significant)). Chapter 12 Population and Human Health of the Environmental Statement [APP-051] also provides an assessment of the effects on human health during the operation stage of the Scheme (paragraphs 12.18.68 to 12.18.101). While the effects on communities overall are assessed as significant during the construction stage, they are not assessed as significant in operation compared to the baseline conditions without the Scheme. In particular, the new highway surfacing to be provided with improved noise reducing properties, has been assessed as significantly positive for human health outcomes as set out in paragraphs 12.18.89 to 12.18.95 and the accompanying Tables 12.36 and 12.37 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment concludes that there would be no significant effects, due to air quality, during construction and operation of the Scheme from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' as set out in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore mitigation measures have been identified and included in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127] which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005]. It is accepted that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise and vibration assessment of the Scheme and includes consideration of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. The Applicant has identified that due to the junction layout and the short distances between junctions on the M60 all sections of the Scheme will need to either remain lit or will be provided with new lighting in accordance with design standards, specified to mitigate, as far as practicable, light spill from the carriageway. This will include installation of "hoods" on the lights where necessary, which will be reviewed as part of the detailed design of the Scheme. The visual effects from street lighting and from car headlights are addressed as part of the visual impact assessment in Chapter 7 Landscape and

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		Visual of the Environmental Statement [APP-046]. Figure 2.3, the Environmental Masterplan, of the Environmental Statement Figures [APP-057] shows the vegetation which would be reinstated along most sections of the highway boundary. By the design year (year 15 of operation) vegetation would establish to provide a similar level of filtering or screening of carriageway lighting and vehicle headlights as provided before the Scheme. In conclusion, the Scheme would not lead to significant adverse effects on air quality and noise and vibration during operation. The Scheme would lead to beneficial effects on noise at some locations during operation, with new highway surfacing with improved noise reducing properties between J17 and J18 of the M60 leading to an overall reduction in road traffic noise, which is likely to be noticeable for some people, at some residential dwellings depending on location. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit which have been removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21 hectares of the Order Limits within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer within the Green Belt following its removal by PfE. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Applicant has developed the construction methodology in relation to the current design of the Scheme and the space available on the existing network to undertake the works. The length of the construction programme is driven by the intention to retain the existing number of traffic lanes open on the M60 / M66 / M62 during construction, to minimise the impact on traffic. Maintaining the existing number of lanes on the network will mean there is little available working space during the daytime and Applicant will need to introduce night-time closures on the M60 / M66 / M62. The traffic management strategy, which gives an overview of the phases and the required network closures during construction, can be found in the Outline Traffic Management Plan [APP-150]. Detailed in the Outline Traffic Management Plan [APP-150] are the proposed diversion routes that will be utilised during night closures of the M60 / M66 / M62. The Scheme will install temporary

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		accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use the local road network (other than in the early enabling works phase where access would be required from the local road network for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology and the installation of boundary fencing). This will minimise any impact to the local road network. The design development and construction methodology will continue to be refined with the aim of reducing the number of full closures at night and use of diversion routes. The Outline Traffic Management Plan [APP-150] will be developed into the Traffic Management Plan and secured through Requirement 10 of the draft Development Consent Order [PD1-005]. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working, for those receptors closest to the works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] at Appendix B which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains the Register of Environmental Actions and Commitments, which includes measures to reduce noise from construction activities including a commitment to minimise the total number of full carriageway closures that will require the use of traffic diversion routes. Measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work, however during the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The Applicant has undertaken assessments to ensure that the Scheme design has been developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details are available in the Transport Assessment [APP-149]. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high

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		volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified BCR of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 which sets out up to date statistics for the strategic road network "*In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)."* Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at the Simister Interchange will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following *"This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location."* Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network.

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		The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-011 - Save Greater Manchester's Green Belt		
RR-011	*We object to the proposed scheme at Simister Island Interchange. Both St Margaret's C of E Primary School (200m from the M62) and Parrenthorn High School (300m away from M62 & M60) are too close and will be negatively impacted.* *National Highways have only ever proposed or examined variations of a road-building proposal, never non-roadbuilding alternatives to reduce demand or its impact. It is one of the busiest motorway junctions in the northwest and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand.* *Construction is set to take place at night over a three-and-a-half-year*	The Applicant acknowledges that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening. This is unlikely to be noticeable but still amounts to a reduction on current levels. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The

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	period, causing unacceptable noise and disturbance to residents. Night-time motorway closures will transfer traffic onto the local road network, increasing noise, disturbance and increasing air pollution for residents. Increase of noise for residents and users at Kenilworth Avenue, Warwick Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane. *There is no road accident information and we believe the scheme would lead to an increase in fatal, serious and slight casualties.* *With or without the scheme, air pollution levels will still be unacceptably high, above safe limits and in some places will be made worse. We are aware neither Manchester City Council, Bury Council or Rochdale Council have up-to-date figures on air quality monitoring within the area. No detailed air quality modelling has been carried out by councils and/or National Highways. It seems there is no collaboration by authorities at all on this issue. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road network.* *There are no significant benefits to the scheme, only small time savings. This results in the scheme being low value for money with a benefit-to-cost ratio of just 1.17. The scheme barely pays its way, with every £1 spent on the scheme, taxpayers only see £1.17 of benefits. This situation could easily change with any cost overruns.* *68 hectares of land surrounding Junction 18 is in the Green Belt. There is no assessment of Green Belt harm.* *Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over 60 years due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so. We believe the scheme will increase traffic, pollution and carbon emissions and will impact GM's ability to meet its targets (for carbon emissions, nature's recovery, air pollution, etc).* *The scheme is not a sustainable solution. It will not support a modal shift from road to rail/water for freight transport. It will not support a modal shift from road to public transport/active travel for car users.* *Local people and wildlife will be significantly impacted by the increased pollution caused by the scheme (air, noise, light, vibration and water). No investigation into the high incidence of respiratory disease in*	results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60 significant adverse construction noise effects are predicted during both day and night-time working during online works (works on the carriageway) when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilisation and online works when these works are within around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane significant adverse construction noise effects are predicted during both day and night-time working during mobilization, and during the night-time period during online and offline works (works off the carriageway). For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilisation and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. By way of compensation for the impact that construction works can have on properties or individuals, the Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called '*Your property and compensation or mitigation for the effects of our road proposals*' sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in 'Your property and our road proposals'. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains the Register of Environmental Actions and Commitments, that includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Chapter 8 Biodiversity of the Environmental Statement [APP-047] provides a full assessment of the effects on wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. Chapter 8 Biodiversity of the Environmental Statement [APP-047] details the embedded and essential mitigation required to offset impacts. These

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	Blackley has been forthcoming, this was brought up at the P4E Examination in Public but not adequately addressed. There is no information about the carbon emissions caused by the construction of the scheme, nor the total additional carbon emissions over the lifetime of the scheme. *Traffic modelling is based on 2018 forecasts, which are 5 years out of date (there have been significant increases in traffic in GM since 2018). Costs are estimated at between £260m-£340m for the scheme itself, but there are potential additional transport interventions which would take the costs significantly over this figure - we believe the funding would be better spent on sustainable transport options for Greater Manchester (public transport and sustainable freight).*	measures are set out within the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 8: Biodiversity of the Environmental Statement [APP-047] concludes that there would be no significant effects (i.e. moderate, large or very large effects) once mitigation has been taken into account, on any biodiversity receptor due to construction and operation of the Scheme. Chapter 5 Air Quality of the Environmental Statement [APP-044], and Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079], provide details of the methodology used to assess air quality impacts as a result of the Scheme. Chapter 5 Air Quality of the Environmental Statement [APP-044] also sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. The methodology followed is in accordance with National Highways' DMRB LA 105 (Air quality). Modelled traffic data for the Scheme opening year (2029) is used to undertake detailed modelling of air pollution both with and without the Scheme. As monitoring cannot be undertaken for future years, modelling is used. The resulting predicted concentrations are then compared with the UK air quality objectives and limit values for air quality for nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), which are discussed and presented in Chapter 5 Air Quality of the Environmental Statement [APP-044]. In addition, a past year is also modelled (in this case 2018 to reflect the base year traffic data) using the same methodology and the results compared to monitored air pollution data for the same year (2018) to confirm that the methodology provides robust predictions. Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079] provides details of nitrogen dioxide monitoring data, which includes some local authority monitoring. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). Dust from construction is discussed in section 5.8 of Chapter 5 Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' and therefore mitigation measures have been set out in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127], which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005].The Applicant notes the reference to high incidence of respiratory disease in Blackley. The ward of Higher Blackley was excluded from the population health profiles presented in Chapter 12: Population and Human Health of the Environmental Statement [APP-051] as the distance between the residential population and the Scheme is over 1km (paragraph 12.15.2). Respiratory health indicators were considered in the health profiles for other wards in the study area, for example Besses ward has significantly higher than average deaths from respiratory disease and emergency admissions for chronic obstructive pulmonary disease. While it is not the role of the assessment to investigate high incidences of respiratory diseases, this information did inform the judgement that the population is of high sensitivity to health impacts as shown in Tables 12.29 and 12.32 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. The human health assessment did not predict any significant effects on population health due to changes in air quality as a result of the Scheme since the changes in concentrations of key pollutants would be small or imperceptible and would be within statutory standards as set out in paragraphs 12.18.70 – 12.18.74 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has

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		removed the land in the north east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit which have been removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct will no longer be within the Green Belt following its removal by PfE. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Applicant has undertaken assessments to ensure that the Scheme design is being developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details can be found in the Transport Assessment [APP-149]. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced

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		on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified BCR of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 which sets out up to date statistics for the strategic road network "*In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)*." Analysis of various traffic data indicates that the

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		above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at Simister will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following "*This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location*." Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on

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		the strategic road network will become net zero by 2050.
RR-012 - Steady State Manchester		
RR-012a	*I object to the proposed scheme at Simister Island Interchange. The scheme concerns one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Increasing capacity has been consistently shown to increase demand. Instead of increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. St Margaret's C of E Primary School is only 200m from the M62, while Parrenthorn High School is only 300m away (and a similar distance from the M60) so both will be negatively impacted by this scheme. With or without the scheme, air pollution levels, even after a likely transition to electric vehicles over the life of the scheme, will still be unacceptably high and above safe limits and in some places will be made worse. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road.*	The Applicant acknowledges that, with the Scheme in place, a reduction in delay and journey time is forecast for routes through the Scheme area. In turn, this attracts some additional traffic to the strategic road network around the Scheme. These increases are from a combination of reassignment from the local road network, 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. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits. The Applicant acknowledges that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening, which whilst a reduction compared with the current situation is unlikely to be noticeable.
RR-012b	*As National Highways' own assessment shows, carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over 60 years due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so. As a government agency, National Highways is bound by the provisions of the Climate Change Act 2008 and must therefore take this into account.*	The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan

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		[APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-013 - Squire Patton Boggs UK LLP on behalf of The Trustees of Pike Fold Golf Club		
RR-013a	*1.We act for the Trustees of Pike Fold Golf Club ("PFGC") and have been instructed to submit relevant representations on their behalf. The Trustees of PFGC are the freehold owners and operators of PFGC.*	The Applicant notes that Squire Patton Boggs UK LLP have been instructed to represent the Pike Fold Golf Club (PFGC).
RR-013b	*2. As an affected landowner of the proposed DCO, we respectfully request the Examiner accept the Trustees of PFGC as an interested party for the purposes of the Examination process. The Trustees of PFGC are continuing to review the application material, with the intention that further detail will be provided at the written representation stage. However, a summary of the impacts of the proposed DCO are set out below.*	The Applicant notes that PFGC are continuing to review the application material and will make a written representation during the examination of the application for development consent for the Scheme
RR-013c	*3. The proposed DCO requires the temporary use of land owned by the Trustees of PFGC and the subsequent acquisition of permanent rights over this land.*	The Applicant has been in discussions with Pike Fold Golf Course with the aim of acquiring by agreement the necessary land interests required to construct and operate the Scheme. Further details on the latest status of these negotiations can be found at Annex B of the Statement of Reasons [APP-018].
RR-013d	*4. Additionally, the proposed DCO requires the use of compulsory acquisition powers to permanently acquire land owned by the Trustees of PFGC.*	See response above.
RR-013e	*5. The temporary land use and the permanent acquisition of land for the implementation of the proposed DCO would result in a significant impact on the operation of PFGC, not least because if no action is taken ahead of the DCO, the course would become a 14 hole golf course for the period during which the DCO works are carried out. This*	The Applicant can confirm that discussions are progressing with PFGC about the impacts of the Scheme on the course with a view to mitigating the impacts where possible. This has included working with PFGC to secure appointment by PFGC of a golf course architect to review and consider mitigation works which would enable the course to be reconfigured to enable it to remain an 18 hole golf course, both during the works and following completion. Consideration is also being given to the timing of any mitigation works to minimise the impact on the operation of the course including to minimise any loss of

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	will have a significant impact on the operation of PFGC and will negatively impact the running of PFGC through a loss of income.	income.
RR-013f	*6. Further, the proposed DCO works would reduce the existing safety margins and screening between the course and the motorway network. This would lead to detrimental impacts in terms of length of course, playability, quality of landscape, noise pollution and visual impacts on the users of the course. These impacts would again affect the running of PFGC negatively in terms of the disruption to the business and its income, as well as its future sustainability.*	The Applicant has undertaken a Landscape and Visual Impact Assessment which is included in Chapter 7, Landscape and Visual, of the Environmental Statement [APP-046] and has looked at the landscape and visual impacts of the Scheme on users of Pike Fold Golf Course. The mitigation planting detailed in Figure 2.3, Environmental Masterplan, of the Environmental Statement Figures [APP-057] will establish over time and the assessment has concluded that by year 15 the landscape character and visual amenity impacts of the Scheme would be slight adverse, not significant. Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme. Predictions of the change in road traffic noise for receptors within 600m of the proposed scheme are provided in Appendix 11.5 (Operational Noise Calculation Results) [APP-113]. Predictions of the change in road traffic noise have been made for non-residential receptors as presented in Table 1.2 of this Appendix. At a position on the Public Right of Way 9WHI alongside the M66 southbound and the southern edge of Pike Fold Golf Course a Minor magnitude increase in road traffic noise of 1.3dB has been predicted on Scheme opening. Changes in road traffic noise of 3dB or more can be perceptible to people, so this increase in road traffic noise is not likely to be noticeable to most people. Further, this predicted increase is at the closest point to the motorways and the Northern Loop, with increased distance from the Scheme any change is likely to be less noticeable. The Applicant can confirm that discussions are progressing with PFGC about the impacts of the Scheme on the course in terms of "safety margins" and "playability" with a view to mitigating the impacts where possible. This has included working with PFGC to secure appointment by PFGC of a golf course architect to review and consider mitigation works which would enable the course to be reconfigured to enable it to remain playable and safe for golfers and road users, both during the works and following completion.
RR-013g	*7. Overall, the business disruption caused by the proposed DCO would likely be catastrophic for PFGC.*	See responses above.
RR-013h	*8. The Trustees of PFGC have been in discussion with National Highways regarding the effects of the proposed DCO for a number of years and whilst it is hopeful a resolution can agreed between the parties in relation to the impacts noted above, until such an agreement is in place there is clearly a significant risk to PFGC. Without agreement between the parties to carry out works in anticipation of the DCO, the course would become 14 hole course for a lengthy period whilst the DCO works are carried out, resulting in a significant impact on the level of membership of the Club, visitor numbers and the income thereby generated.*	See responses above. The Applicant will continue discussions with PFGC with a view to concluding an appropriate agreement to address the impacts of the Scheme on the course.
RR-013i	*9. We reserve our client's position to expand on this representation.*	The Applicant notes that PFGC reserve their right to expand on their Relevant Representation.
RR-014 - Transport Action Network		
RR-014	*Transport Action Network (TAN) objects to the proposed scheme at Simister Island Interchange. It is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA).* *Rather than increasing capacity, National Highways should be seeking*	Two sets of NPS NN accordance tables were submitted with the application for development consent. One accordance table covers the January 2015 designated NPS NN [APP-147] and the draft version of the NPS NN as at March 2023 [APP-148]. The latter was the most recent version of the NPS NN at the time of the application for development consent . Therefore, an additional submission in July 2024, was accepted at the discretion of the Examining Authority [AS-007] which provided a comparative assessment of the designated and draft version of the NPS NN which was subsequently designated in May 2024. Therefore, the Applicant has assessed the Scheme against all versions of the NPS NN to demonstrate its

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	to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. National Highways have only ever proposed or examined variations of a road building proposal, never non-roadbuilding alternatives to reduce demand, contrary to the National Network National Policy Statement (NNNPS) and the EIA Regulations. *Construction will take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents. [Table 11.18 of Chapter 11 Noise and Vibration, APP-050] Night time motorway closures will transfer traffic onto the local road network, increasing noise and disturbance for local residents at night. There will be an increase in noise at Kenilworth Avenue, Warwick Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane. [6.15.22 of Case for the Scheme, APP-146]* *The scheme would lead to an increase in fatal, serious and slight casualties. [1.4.1 of the Case for the Scheme, APP-146]* *With or without the scheme, air pollution levels will still be unacceptably high and above safe limits. The scheme reduces air quality in some areas. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road.* *There are no significant benefits to the scheme, only small time savings and modest economic growth, which results in the scheme being very poor value for money with a Benefit to Cost Ratio of just 1.17 (Low value for money according to the DfT's guidance). This means that for every £1 spent on the scheme, taxpayers only see £1.17 returned to society. [5.4.4 of the Case for the Scheme, APP-146]* *68 hectares of land surrounding Junction 18 is in the Green Belt. [6.8.11 of the Case for the Scheme, APP-146]* *Carbon emissions would be increased by 62,013 tonnes during construction [Table 14-22 of Chapter 14 of the Environmental Statement, APP-053], and 151,090 tonnes over 60 years due to the increased traffic [Table 14-23 of Chapter 14 of the Environmental Statement, APP-053]. This makes it even harder for the UK to reach its legally binding climate targets which we are already off target to reach.*	overall compliance. The NPS NN provides national planning policy on road and rail infrastructure schemes, including Strategic Rail Freight Interchanges. Section 3 of the NPS NN (designated January 2015) sets out wider Government policy on national networks. Paragraph 3.1 states: *"The need for development of the national networks, and the Government's policy for addressing that need, must be seen in the context of the Government's wider policies on economic performance, environment, safety, technology, sustainable transport and accessibility, as well as journey reliability and the experience of road/rail users."* Section 3 of the NPS NN (designated January 2015) does not favour investment in one mode over another, but supports investment in all aspects of the national networks. In terms of assessing alternatives to investment in road transport, paragraph 4.27 of the NPS NN (designated January 2015), states that: "*All projects should be subject to an options appraisal. The appraisal should consider viable modal alternatives and may also consider other options (in light of the paragraphs 3.23 to 3.27 of this NPS). Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process.61 It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken"* The NPS NN designated in May 2024 paragraph 2.5 sets out the importance of the national road network in terms of overall travel choice in England: *"Roads are a critical part of the national transport framework in facilitating connectivity. Every year, road users travel more than 417 billion passenger miles by road in Great Britain, with roads accounting for 91% of passenger miles and 81% of freight by volume10. As set out in the plan for drivers11, cars are the most popular mode of personal travel, and enable people to access work, education, healthcare and shopping, enjoy recreation and meet friends and family".* Section 3 of the NPS NN designated in May 2024 sets out the overall need for development of national networks, including road and rail. This section does not favour investment in one mode over another, but supports investment in all aspects of the national networks. Paragraph 3.22 of section 3 concludes that examining authorities do not need to consider other modal alternatives, as all Nationally Significant Infrastructure Projects form part of a wider integrated network: *"The government has, therefore, concluded that at a strategic level there is a compelling need for development of the strategic road and strategic rail networks, and strategic rail freight interchanges (SRFIs) – both as individual networks and as a fully integrated system. The Examining Authority and the Secretary of State should, therefore, start their consideration of applications for development consent for the types of infrastructure covered by this National Policy Statement (NPS) on this basis. The Secretary of State should give substantial weight to considerations of need where these align with those set out in this NPS".* In terms of the consideration of alternatives, paragraphs 4.21 and 4.22 of the NPS NN designated in May 2024 states that: *"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 Analysis Guidance, and proportionate consideration of alternatives will have been undertaken as part of the investment decision making process. The options*

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		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 43 Authority and the Secretary of State should satisfy themselves that the options appraisal process has been undertaken". *"Where an options appraisal process has been undertaken, it should not be necessary to consider alternatives except where paragraph 4.20 applies or where the "exceptional circumstances" test set out in case law is met. 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 considered should be determined accordingly".* The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to *"develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines"*. A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2020-2025. Therefore, the options appraisal referred to in both versions of the NPS NN is implied by its inclusion in the Road Investment Strategy. It is unnecessary for the Applicant to consider other modal alternatives further. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. The Applicant acknowledges that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening, which is unlikely to be noticeable. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60 significant adverse construction noise effects are predicted during both day and night-time working during online works when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilization and online works when these works are within

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		around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane significant adverse construction noise effects are predicted during both day and night-time working during mobilization, and during the night-time period during online and offline works. For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilization and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. By way of compensation for the impact that construction works can have on properties or individuals, the Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called *'Your property and compensation or mitigation for the effects of our road proposals*' sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in '*Your property and our road proposals'*. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments , which includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away).

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		The Applicant has undertaken assessments to ensure that the Scheme design has been developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details are available in the Transport Assessment [APP-149]. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified Benefit to Cost ratio (BCR) of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 sets out up to date statistics for the strategic road network "In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per

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		mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)." Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at the Simister Interchange will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following "This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location." Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit which have been removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will; no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt as result of PfE. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the

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		national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time. and the lack of alternatives with less impact on the Green Belt. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-015 - United Utilities Water Limited		
RR-015a	*United Utilities Water Limited (United Utilities) wishes to register as an interested party in the application for a Development Consent Order for the M60/M62/M66 Simister Island Interchange improvements. We have had meaningful engagement with the applicant in the evolution of the proposals and look forward to this continuing during the examination process. We have conducted an initial review of the submitted documents, however, we request continued engagement to ensure any of our concerns are adequately addressed and to ensure appropriate protective provisions are agreed. We will shortly be engaging with the applicant to outline our preferred protective provisions for inclusion in*	**T**he Applicant has included protective provisions in the draft Development Consent Order [PD1-005] in favour of water undertakers. The Applicant is in correspondence with the in-house legal team for United Utilities with a view to agreeing the form of wording. The Applicant acknowledges that it is responsible for the protection of United Utilities assets during the construction of the Scheme. The Applicant will ensure that Untied Utilities required access is provided during construction. The Applicant has had ongoing engagement with United Utilities throughout preliminary design. The Applicant has undertaken preliminary enquiries which were responded to by United Utilities. Draft schemes and budget estimates were requested by the Applicant and responded to by United Utilities in 2023. The Applicant has undertaken an assessment on the impact of the Scheme on the United Utilities infrastructure. Joint

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	any Development Consent Order (DCO). The issues which are important to United Utilities as part of the consideration of the application are set out below. *1. Our Assets and Property* *UUW will not allow building over or in close proximity to a water main. UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. The applicant should not assume that our assets can be diverted. We note the vast amount of information submitted as part of the proposals. We would be grateful if the applicant can provide the latest information on the proposed works and any associated development in a shp file format. Water Mains and Public Sewers There are a range of water mains including large diameter trunk mains within the proposed Order Limits. These assets include the Haweswater Aqueduct, which is a major water supply asset. There are also a range of public sewers including large diameter sewers and rising sewers. Our wastewater assets include the Mersey Valley Sludge Pipeline, which is a high pressurised sludge pipeline. It is a 400mm ductile iron pipeline which runs from Oldham Wastewater Treatment Works in Greater Manchester via a series of wastewater treatment works in the Mersey Valley before terminating at Liverpool Wastewater Treatment Works. The pipeline is laid and operated under the 1977 North West Water Authority Act. It operates at pressures up to 25 bars (375 psi) and a flow rate of up to 205 litres/sec. Further dialogue and agreement in respect of these assets is critical so that the approach to protecting our assets is agreed. We require access as detailed in our 'Standard Conditions for Works Adjacent to Pipelines', (a copy of which has been provided to the applicant). The applicant must comply with our Standard Conditions document. This should be taken into account in the final proposals, or a diversion may be necessary. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion required as a result of any development will be at the applicant's expense. It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed development. The applicant should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Where United Utilities' assets cross the proposed Order Limits, the applicant must contact United Utilities prior to commencing any works on site, including trial holes, groundworks or demolition. Although the applicant has undertaken detailed engagement relating to the protection of our assets and potential diversions, we wish to highlight the following points as part of the examination. The applicant should be aware that operational constraints or long lead in items may impact on the future construction*	discussions were held between the Applicant and United Utilities during the draft schemes and budget estimate development. The Applicant's assessment shows that there are ten United Utilities assets that are in close proximity to the works which include works at the Haweswater Aqueduct, various distribution mains and combined public sewers. The Applicant has completed an assessment of the interaction of the new infrastructure with the Mersey Valley Sludge Pipe and can confirm that it will not interact with the pipeline. The Applicant will continue discussions with United Utilities in relation to these assets to ensure that the 'Standard Conditions for Works Adjacent to Pipelines' document is complied with during design development and construction of the Scheme. The Applicant has shared with United Utilities the preliminary design information during the development of the draft schemes and budget estimates. The Applicant will continue to share design information during the detailed design of the Scheme. The Applicant will share the latest information on the works and any associated development in a .shp file format during the detailed design estimates for the statutory undertaker diversions as requested by United Utilities The Applicant acknowledges that operational constraints or long lead in times may impact on the future construction programme and are continuing engagement with United Utilities to ensure that its construction programme is aligned with the expected durations for any diversion works as part of the construction of the Scheme. The Applicant acknowledges that assets may not be able to be diverted and as part of the development of the detailed design of the Scheme the priority will be to remove interfaces with United Utilities assets where possible. The Applicant acknowledges that there should be no additional load bearing capacity on United Utilities assets during or after construction without prior agreement with United Utilities. The Applicant will give consideration to the change in land levels, construction traffic crossing points, as well as any landscaping and biodiversity measures in the vicinity of United Utilities' assets. The Applicant has had ongoing engagement in relation to planting in the vicinity of United Utilities' assets. As a result. the Applicant has refined the location of trees and shrubbery to ensure that they do not interact with existing assets. The Applicant will continue engagement during the detailed design of the Scheme, including planting in the vicinity of United Utilities assets. The Applicant will consider the impact of any potential settlement and vibration on United Utilities' assets during and after the construction of the Scheme. Storage of equipment and materials will not be undertaken on a United Utilities' asset and access to their asset will be maintained throughout the development of the Scheme. The Applicant will not locate any temporary construction compound or top of United Utilities' apparatus.. The temporary construction traffic management layout, that details the interaction of the temporary construction compound and temporary construction traffic routes, will be shared with United Utilities during the continued engagement to ensure that the protection of their assets is considered.

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	programme. The applicant should not assume that our assets can be diverted. Where United Utilities' assets exist, the level of cover to our pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on our assets without prior agreement with United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles. The applicant should therefore give careful consideration to the implications of any changes in proposed land levels. Any such changes will need to be agreed with United Utilities. The applicant must also give careful consideration to any proposed crossing points (access points and services that cross our assets) as well as any landscaping and biodiversity proposals in the vicinity of our assets. Our Standard Conditions document includes details of trees and shrubbery suitable for planting in the vicinity of our assets. Deep rooted shrubs and trees should not be planted near to our apparatus. Consideration should also be given to United Utilities' assets which may be located outside the Order Limits. Any construction activities in the vicinity of our assets must comply with our 'Standard Conditions for Works Adjacent to Pipelines' and national building standards. It is the applicant's responsibility to ensure that United Utilities' required access is provided within the proposal and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to United Utilities' assets resulting from their activity. See 'Contacts' section below. Vibration, Settlement and Loading United Utilities requests that the applicant considers the impact of any potential settlement and vibration on United Utilities' assets. Similarly, any loading on United Utilities' assets during operation or during construction requires careful consideration with United Utilities. Storage of Equipment and Materials within Easements / Offset Areas for Access and Maintenance United Utilities has not undertaken a detailed assessment of where equipment and/or materials are proposed to be stored within a United Utilities' easement / area required for access and maintenance. The applicant should ensure that these are not located on our assets and do not affect our right to access our assets. United Utilities does not usually allow the easement area, easement width or the necessary offset distance from our assets to be obstructed or impeded in any way. This is due to, but not limited to: - loading implications of the asset and probability of asset failure; - implications on access and maintenance of the asset, especially for critical assets; - security of supply; and - health and safety implications. United Utilities reserves the right to instruct the removal of equipment and materials located within the easement / access and maintenance offset area. United Utilities requires further consultation and supplementary information to discuss any affected assets. Construction Compounds / Construction Traffic We wish to emphasise that construction compounds should not be located on top of our apparatus. This is because we require unrestricted access for maintenance, repair and	

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	replacement to discharge our statutory duties. Similarly, detailed consideration will need to be given to any proposed construction traffic routes to assess the impact on our assets. It will be necessary to ensure that any approach to construction is the subject of a construction management plan to address a range of issues including the protection of our assets as well as any wider impact on our operations. Ecological Mitigation and Biodiversity Net Gain We wish to emphasise that ecological mitigation and the delivery of areas for biodiversity net gain should not be located on top of our apparatus. This is because we require unrestricted access for maintenance, repair and replacement to discharge our statutory duties. Property Interests Within the Order Limits, we have property interests which include legal easements. These are in addition to our statutory rights for inspection, maintenance and repair. The easements have restrictive covenants that must be adhered to. It is the responsibility of the developer to obtain a copy of the document, available from United Utilities Legal Services or Land Registry and to comply with the provisions stated within the document. Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipes or the legal right of United Utilities to 24 hour access. Part 3 of the Book of Reference identifies a large number of easements and apparatus owned by United Utilities that may be affected by the proposal. We note that the assets which are identified as having an easement that may be affected are not always covered by formal easement, but rather the rights of access provided to us via the statutory powers in the Water Industry Act 1991. We would be grateful to discuss the impact of the proposals on access to assets. We wish to confirm how our access to our assets will be materially affected by the proposed works. The applicant will need to ensure that access to our assets for maintenance, repair and replacement is not adversely affected as a result of the proposed development.	
RR-015b	*2. Flood Risk* *Existing drainage systems are often dominated by combined sewers. This method of sewer infrastructure is a result of the time it was constructed, with combined sewers taking both foul and surface water. If there is a consistent approach to surface water management, it will help to manage and reduce surface water entering the sewer network, decreasing the likelihood of flooding from sewers, the impact on residents and businesses, and the impact on the environment. Whilst we do all that we can to reduce the risk of sewer flooding, there remains a residual risk, which is a source of flooding that should be considered in the Environmental Statement (ES). National policy is clear that flood risk from all sources, including sewers, must be considered in the delivery of new development. As such, it is important to ensure that the assessment of flood risk includes sewer flood risk. It should be ensured that the proposed development does not result in an increase in flood*	The Applicant has undertaken a flood risk assessment for the Scheme which can be found in Appendix 13.6 Flood Risk Assessment of the Environmental Statement Appendices [APP-121]. The flood risk assessment has been prepared in accordance with the NPS NN (this includes both the NPS NN designated in 2014 and 2024) and presents an assessment of flood risk from all sources, including sewer flood risk. Two sets of NPS NN accordance tables were submitted with the application for development consent which cover the January 2015 designated NPS NN [APP-147] and the draft version of the NPS NN as at March 2023 [APP-148]. The latter was the most recent version of the NPS NN at the time of the application for development consent submission and which was subsequently designated in May 2024. Therefore, an additional submission in July 2024, was accepted at the discretion of the Examining Authority [AS-007] which provided a comparative assessment of the designated and draft version of the NPS NN designated in May 2024. The Applicant has accordingly assessed the Scheme against all water and climate related aspects of the NPS NN including flood risk. The Scheme would pass over areas where there are water utilities infrastructure. It is anticipated that protection measures will be required in areas where infrastructure is located to support the construction phase of the Scheme. The exact

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	risk from the public sewer as a result of: i) any proposed new drainage connections to the public sewer. This is considered in further detail below; ii) by altering any existing exceedance flood paths of losses from the public sewer; iii) as a result of any diversions / works to watercourses or existing sewers which could materially affect hydraulic performance and therefore change / increase any risk of flooding; iv) as a result of any changes in ground levels which could materially change existing sewer flood risk; or v) as a result of any changes to land or property currently affected by existing hydraulic sewer flooding incidents. Impact on Watercourses If the applicant proposes any changes to watercourses as a result of the application, we would wish to confirm the impact on any watercourses that interact with our assets to ensure that there are no detrimental consequences of these works in terms of asset operation, flood risk and changes to fluvial geomorphological processes.	requirements and details of any protection measures will be developed during detailed design. The Scheme would result in an increase in impermeable area to be drained by the drainage system. Without mitigation this would result in an increase in surface water runoff rates and exacerbate downstream flood risk. With embedded mitigation in the form of a drainage design which provides storage and attenuation there is no increased risk on receiving drainage networks. The Scheme includes a drainage design which has taken into account flooding risk, full details of the drainage strategy can be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The drainage design has been developed in line with the requirements of CG501 - 'Design of highways drainage systems 'which forms part of National Highways' DMRB. As part of the drainage strategy, attenuation ponds are provided on a number of drainage networks. These are sized to accommodate a 1 in 100-year flow event along with a 30% increase in flow due to climate change. Attenuation will also be provided within the Scheme through the provision of oversized pipes which will increase the storage capacity of the system following heavy rainfall events. The Scheme will introduce a number of drainage outfalls associated with the drainage system. These have the potential to impact watercourses by altering local flow dynamics and localised bed and bank scour. Through implementation of best practice, secured via Commitment W16 in the Register for Environmental Actions and Commitments , contained in the First Iteration Environmental Management Plan [APP-127], these impacts will be minimised. It is not anticipated that the watercourses affected by the Scheme interact with United Utilities assets.
RR-015c	*3. Drainage Surface Water Management Hierarchy* *We wish to emphasise that consistent with the principles of the hierarchy for the management of surface water in national planning policy and the obligations of the Environment Act 2021, no surface water will be allowed to discharge to the existing public sewerage system. Surface water should instead discharge to more sustainable alternatives as outlined in the surface water management hierarchy. This will ensure the impact of development on public wastewater infrastructure, both in terms of the wastewater network and wastewater treatment works, is minimised. We adopt this position as surface water flows are very large when compared with foul flows. By ensuring that no surface water enters the public sewerage system, the impact on customers, watercourses and the environment will be minimised. In this regard, we note the submitted drainage strategy. Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river). There should be no land drainage, including dewatering proposals, discharged to the public sewer. We would like to highlight that United Utilities is under no obligation to accept highway drainage or land drainage to the public sewer. Rights to Discharge to Watercourse or Other Receiving Water Body Given the importance of surface water discharging to an alternative to the public sewer, we request that all land that is necessary to facilitate a discharge to a*	The Applicant confirms the Scheme includes a drainage design which has taken into account flooding risk, and full details of the drainage strategy can be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The drainage design has been developed in line with the requirements of CG501 - 'Design of highways drainage systems 'which forms part of the Design Manual for Roads and Bridges National Highways' DMRB. CG501 incorporates the surface water management hierarchy of the Planning Practice Guidance – Flood Risk and Coastal Change, and there would be no new highway drainage connections to a public sewer. Full details on the drainage system including discharge hierarchy are contained within Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The Applicant understands the position of United Utilities in respect of their responsibilities relating to advice on rates of discharge to the local watercourse system and acknowledges that these are a matter for discussion with the Lead Local Flood Authority and the Environment Agency. The Applicant has consulted with these Authorities and further details can be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The Applicant can confirm there would be no land drainage connections to public sewer, including those from dewatering operations. The Applicant acknowledges the limitation of the powers of the sewerage company in respect of acquiring rights to discharge and the need identified to include, within the Order Limits, all necessary land to facilitate discharges to watercourses and any relocation of outfalls or culverts. The Applicant is committed (Commitment W4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127] to restricting discharge rates and providing associated attenuation storage sized for the 1% (1 in 100) Annual Exceedance Probability storm event including an allowance for

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	watercourse is fully identified within the Order Limits. This will ensure the Order benefits from the requisite rights of discharge to more sustainable alternatives than the public sewer for the management of surface water, e.g., a right to discharge to a watercourse or other water body. For clarity, the extent of land should be sufficient to facilitate a surface water discharge to a watercourse / water body for all elements of the pipeline route. Ensuring that the extent of land within the Order Limits and the supporting ES is sufficient for the purposes of the discharge of surface water is important as a sewerage company has no power to acquire the right to discharge surface water to a water body under the Water Industry Act. It is equally important to ensure that any existing outfalls that it may be necessary to relocate as a result of any watercourse / culvert diversion are delivered under the powers of the Order. Multi-functional Sustainable Drainage Systems We request that surface water is, where possible, managed via sustainable drainage systems, which are multi-functional and at the surface level in preference to conventional underground piped and tanked storage systems. Wherever practicable, Sustainable Drainage Systems (SuDS) should be implemented in accordance with the CIRIA SuDS manual. Managing surface water through the use of SuDS can provide benefits in water quantity, water quality, amenity and biodiversity. Management and Maintenance of Sustainable Drainage Systems Without effective management and maintenance, sustainable drainage systems can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the determining authority of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact. We therefore recommend that the applicant ensures there is a management and maintenance regime for any drainage system that is included as part of the proposed development. Please note United Utilities cannot provide comment on the management and maintenance of an asset that is owned by a third party. We would not be involved in the approval of the management and maintenance arrangements in these circumstances.	climate change. The Applicant is further committed (Commitment W5 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127] to providing water quality treatment using a variety of measures. Details of sustainable drainage systems, attenuation and treatment may be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. Wherever practicable, permanently wet ponds are the preferred method of attenuation storage. The Applicant is committed (Commitment W28, of the Register of Environmental Actions and Commitments contained in the First Iteration EMP [APP-127] and obligated to ensure that a maintenance programme is in place during the operation of the highway. This will include a programme of regular and occasional maintenance by the Applicant. The drainage strategy includes details of the maintenance and operational requirements for the drainage system, and refers to the legal duties of the Highway Authority to maintain the road. Reference is also made to GM701 – 'Asset delivery asset maintenance requirements', which forms part of National Highways' DMRB , and in particular the detailed requirements for drainage systems outlined in Table E/A.3 therein. The Applicant acknowledges the position of United Utilities in respect to the management and maintenance of third party assets and any related approvals.

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RR-015d	*4. Geo Environmental / Geotechnical Water Environment / Contaminated Land* *You should ensure that your proposal has no unacceptable impact on the water environment including the groundwater environment. United Utilities requests that the assessment of potential environmental impact from contamination fully considers the impact on our assets, water resources and water quality as a result of construction of the proposed development.*	The Applicant confirms that potential construction and operation impacts from the Scheme on controlled waters from soil leachate and groundwater contaminant exceedances are not considered significant and do not warrant any remediation to facilitate the Scheme. See Paragraph 9.8.10 and Paragraph 9.8.19 of Chapter 9 Geology and Soils of the Environmental Statement [APP-048]. A Controlled Waters risk assessment was undertaken as part of the Ground Investigation Report, provided as Appendix 9.3 of the Environmental Statement Appendices [APP-108] and has been summarised in Chapter 9 Geology and Soils of the Environmental Statement [APP-048]. As Thiocynate was detected over threshold limits in the limited groundwater sampling data available at the time of assessment, it was recommended that further groundwater and surface water sampling should be undertaken prior to the construction phase to help inform the completion of a Detailed Quantitative Risk Assessment for groundwater as secured by commitment GS1 in the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. Should unacceptable risks to controlled waters be identified, a remediation strategy will be developed. In addition, in accordance with commitment GS5 in the Register of Environmental Actions and Commitments, construction techniques will be implemented to mitigate any potential contamination risks to construction workers, adjacent land users/residents and controlled waters during construction or operation of the Scheme. Through the implementation of measures which will be detailed in the Surface and Ground Water Management Plan which will be developed from the Outline Surface and Groundwater Management Plan [APP-135], Appendix H of the First Iteration Environmental Management Plan [APP-127], impacts on the water environment (contamination and water quality) will be minimised. These measures will be to control the storage, handling, spillages and disposal of potentially polluting substances during construction. The Surface and Ground Water Management Plan will also include the requirements to undertake monitoring of ground and surface waters on a temporal and spatial basis prior to and during the construction phase, including a programme of baseline water quality monitoring to be conducted prior to the commencement of works.
RR-015e	*5. Water Supply Requirements* *We request that the applicant confirms any water supply requirements for construction. This should include details on rates of water supply required in litres per second. The details of water supply required should include details for any fire response purposes that may be necessary. For temporary related activities, such as construction compounds and workers accommodation, early consideration of any water supply requirements will also be required. If reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.*	The Applicant is currently undertaking its design of the temporary construction compounds and will confirm the water supply requirements in due course. The Applicant will include details of the water supply required in litres per second during its application for the budget estimate for the temporary water connection.
RR-015f	*6. Future Growth and Infrastructure Needs* *We request the opportunity to liaise with the applicant to consider any growth which is proposed in the vicinity of the proposed works and the associated water and wastewater requirements. In particular, we are very mindful of the growth that is proposed within this area in the*	The Applicant welcomes the opportunity to collaborate with all stakeholders to enable efficient delivery of infrastructure to support future growth. The Applicant has had regard to the development and adoption of PfE in preparing the application for the Scheme.

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	Greater Manchester Spatial Framework, now referred to as 'Places for Everyone', which is adopted. We are keen to ensure that the necessary infrastructure and connection points to facilitate any proposed growth locations are most appropriately managed and this may necessitate close liaison with the applicant as part of any highway improvement works to ensure that this infrastructure is available and accommodated in the detail of the design.	
RR-015g	*7. General Advice If the applicant intends to request water and/or wastewater services from United Utilities, they should visit our website for advice. This includes seeking confirmation of the required metering arrangements for the proposed development. If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the arrangements will be suitable for the new proposal. In some circumstances we may require a compulsory meter is fitted. For detailed guidance on whether the development will require a compulsory meter please visit https://www.unitedutilities.com/my-account/your-bill/our-household-charges-20212022/ and go to section 7.7 for compulsory metering. To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services, and metering arrangements, at the earliest opportunity. Please see 'Contacts' section below. Contacts The planning contact for this proposal at United Utilities is Andrew Leyssens, Planning Manager. Website For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the 'Live Chat' function, please visit: http://www.unitedutilities.com/builders-developers.aspx Property Searches (for asset maps): A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit https://www.unitedutilities.com/property-searches/ Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority. The position of the underground apparatus shown on asset maps is approximate only and is given in accordance with the best information currently available. United Utilities will not accept liability for any loss or damage caused by the actual position being different from those shown on the map. If you wish to discuss the detail of this submission further, please do not hesitate to contact Andrew Leyssens at planning.liaison@uuplc.co.uk.*	The Applicant acknowledges the importance of seeking advice regarding water and wastewater services, and metering arrangements at the earliest convenience to avoid any unnecessary costs and delays. The Applicant will continue to engage with United Utilities as the Scheme design progresses.
RR-016 - Renate Aspden		
RR-016	*I object to the proposed scheme at Simister Island Interchange. It is one of the busiest motorway junctions in the north-west, and is already*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the

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	within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. Please, invest in incentivising traffic reduction instead. It would improve the health and well-being of many.	intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. The Applicant acknowledges that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise may be noticeable for some people. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away).
RR-017 - Mair Bain		
RR-017	*I object to the proposed scheme at Simister Island Interchange. Rather than increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. National Highways have only ever proposed or examined variations of a road building proposal, never non-roadbuilding alternatives to reduce demand or its impact.* *Construction will take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents. With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road.*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. The Applicant has developed the construction methodology in relation to the preliminary design of the Scheme and the space available on the existing network. The length of the programme is driven by the Applicant's intention to retain the

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	There are no significant benefits to the scheme, only small time savings. This results in the scheme being low value for money with a Benefit to Cost Ratio of just 1.17. The scheme barely pays its way, with every £1 spent on the scheme, taxpayers only see £1.17 of benefits. This situation could easily change with any cost overruns. *68 hectares of land surrounding Junction 18 is in the Green Belt.* *Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over 60 years due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so. The UK Government's Net Zero strategy and carbon budget delivery pathway were found unlawful on two occasions at the high court. The Government's own Committee on Climate Change has recommended the UK Government reviews building new roads due to the increase in emissions from construction and increased traffic. The Government is continuing to build new roads that will increase emissions without checking if they are compatible with Net Zero targets as the plans so far have been found unlawful.*	existing number of traffic lanes open on the M60 / M66 / M62 during construction, to minimise the impact of construction on traffic. Maintaining the existing number of lanes on the network will mean there is little available working space during the daytime, and therefore there is a need to introduce night time closures on the M60 / M66 / M62. The traffic management strategy, which gives an overview of the phases and the required network closures during construction, can be found in the Outline Traffic Management Plan [APP-150]. The design development and construction methodology will continue to be refined with the aim of reducing the amount nighttime working where possible Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct will no longer be in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at

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		the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified BCR of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the Strategic Road Network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 sets out up to date statistics for the strategic road network *"In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)."* Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at Simister will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following *"This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location."* Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are

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		presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-018 - Paul Bancroft		
RR-018	*I live quite close to the m60 motorway and have young children like most of the residents near me and are worried about the pollution and noise increase,the pollution is bad enough from all the exhaust gases so this will only increase with more traffic using the five lanes and the noise is terrible on certain days especially now with it being summer and using the garden more. Also there's 2 schools close by who also will see an increase in pollution intake by pupils which will result in problems like asthma. Another question if these plans for extending the motorway go ahead what will be done in noise cancelling side of things and will we be compensated for all the sleep less nights with the work being carried out at night.my windows on my house are constantly thick with dirt and need cleaning constantly with all the pollution coming from the motorway...there's loads of factors need addressing*	The Applicant confirms Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits. The Applicant acknowledges that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low

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		Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening, which is unlikely to be noticeable. Predictions of road traffic noise changes in the area of Parrenthorn Road indicate a reduction in road traffic noise of between 1-3 dB on Scheme opening, which although an improvement on the current situation is also unlikely to be noticeable. The Applicant has also carried out an assessment of likely construction noise and vibration effects as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] also contains a Register of Environmental Actions and Commitments. These will include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, we will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, by a range of modes including, for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns about noise and other disruption that may affect residents.
RR-019 - Jonathan bethel		
RR-019a	*The main issues I can see are the added noise and air pollution*	The Applicant confirms that Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. The Applicant has also carried out an assessment of likely construction noise and vibration effects, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of

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		Environmental Actions and Commitments . The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects are assessed based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore mitigation measures have been set out in an Outline Air Quality and Dust Management Plan ;[APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127] which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005].
RR-019b	*the drop in house prices to house owners like us that will take a hit*	The Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called 'Your property and compensation or mitigation for the effects of our road proposals' sets out the types of compensation that may be available to affected property owners.
RR-019c	*and also with the ponds who is responsible for the management of them as they will be near property's and if it floods then there is more issues to people*	The Applicant confirms the Scheme includes a drainage design which has taken into account flooding risk. Full details of the drainage strategy can be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The drainage design has been developed in line with the requirements of CG501 - 'Design of highways drainage systems' which forms part of National Highways' DMRB. As part of the drainage design, attenuation ponds are provided on a number of drainage networks. These are sized to accommodate a 1 in 100-year flow event along with a 30% increase in flow due to climate change. Attenuation will also be provided within the Scheme through the provision of oversized pipes which will increase the storage capacity of the system following heavy rainfall events. This will minimise flooding on the network during operation of the Scheme. The Applicant is committed and obligated to ensure that a maintenance programme is in place during operation of the Scheme. This will include a programme of regular and occasional maintenance by the Applicant, including in respect of the ponds.
RR-020 - Lesley Philippa Bridgwater on behalf of Karen Vera Bridgwater		
RR-020	*I have my horses in the stables opposite the proposed loop and their welfare and overall health will be severely impacted by the work proposed and the length of time it will take to complete the work, due to their ages it may shorten their over all life given the expected air, noise*	The Applicant has carried out an assessment of likely construction noise and vibration effects, which is presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The assessment was carried out in accordance with all relevant industry standard guidance (National Highways' DMRB LA 111 Noise and Vibration standard and British Standard BS 5228), which focuses on the potential impacts in relation to humans. There is no specific guidance on the

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	and light pollution. There is also risk of both land and water pollution. *The telephone mast was recently rebuilt over several weeks in December and the disruption was horrendous due to the inadequate access which is apparently earmarked to be used again.* *The money could be better spent on improving public transport in the area thus encouraging people to leave their cars at home, which given climate change is the only sensible thing to do . The majority of the holdups are on the other side of the motorway so the impact on the traffic will not be proportionate to the cost.*	assessment of impacts on horses and other animals but, applying the outcome of the assessments on humans, the results indicate that there will be adverse effects from construction noise during the construction phase, which includes both daytime and night-time working. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about how potential impacts such as noise and vibration will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments which sets out measures to mitigate the impacts of noise and vibration during construction are set out in the Register of Environmental Actions and Commitments and include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The impacts on animals and horses will be taken into account during the development and preparation of mitigation plans. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team would be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The Applicant confirms that temporary lighting will be required during night working to provide clear visibility and ensure safety of the workforce and road users. Construction lighting will be minimised to the work footprint and strategic access/egress routes to avoid unnecessary temporary lighting when no works are taking place. When night working activities require temporary lighting, mitigation measures will be adopted where practicable, including temporary screening, strategic positioning of lighting units, and adopting the best choice of lighting options dependent upon the task, constraints, and external factors. A commitment to implement lighting measures during construction and maintain a suitable lighting strategy that minimises the impact on sensitive receptors is detailed in the Register of Environmental Actions and Commitments table references G6 and G7 within the First Iteration Environmental Management Plan [APP-127]. The Applicant has committed to developing and adhering to a communication plan prior to work commencing on-site. This commitment is detailed as G3 the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [APP-127]. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives.

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		The Scheme will install temporary accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use Egypt Lane and Simister Lane. There will be the requirement to access from the Egypt Lane and Simister Lane for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology, and the installation of boundary fencing. After the work area has been established then the temporary accesses and egresses into the offline work areas will be utilised. The cable percussion drilling rig will be the largest of the equipment to be used to facilitate construction of the Scheme. The Applicant notes that heavy plant and machinery was likely used to construct the telephone mast references, however no heavy-duty vehicles will use Simister Lane/Egypt Lane during the establishment of work areas. The use of Simister Lane/Egypt Lane is reserved for light duty vehicles only during early enabling works phase.
RR-021 - Lesley Philippa Bridgwater		
RR-021	*My stables are on the land adjacent to the proposed loop, the access to the site would severely hamper my ability to look after my horses and allow me 24 hour access to them due to the amount of lorries, equipment and workmen that would be required to do the work.* *On top of this my horses welfare would be significantly impaired due to light, air and noise pollution 24 hours a day. There could also be pollution of land and water.* *The main traffic problems and tailbacks are on the other side of the island which the loop will not change, I believe the money would be much better spent on public transport to help improve the overall environmental impact of the area.*	The Applicant has carried out an assessment of likely construction noise and vibration effects, which is presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The assessment was carried out in accordance with all relevant industry standard guidance, which focuses on the potential impacts in relation to humans. There is no specific guidance on the assessment of impacts on horses and other animals but, applying the outcome of the assessments on humans, the results indicate that there will be adverse effects from construction noise during the construction phase, which includes both daytime and night-time working. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about how potential impacts such as noise and vibration will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments which sets out measures to mitigate the impacts of noise and vibration during construction are set out in the Register of Environmental Actions and Commitments and include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The impacts on animals and horses will be taken into account during the development and preparation of mitigation plans. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team would be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The Applicant confirms that temporary lighting will be required during night working to provide clear visibility and ensure safety of the workforce and road users. Construction lighting will be minimised to the work footprint and strategic access/egress routes to avoid unnecessary temporary lighting when no works are taking place. When night working activities require temporary lighting, mitigation measures will be adopted where practicable, including temporary screening, strategic positioning of lighting units, and adopting the best choice of lighting options dependent upon the task, constraints, and external factors. A commitment to implement lighting measures during construction and maintain a suitable lighting strategy that minimises the impact on sensitive receptors is detailed in the Register of Environmental Actions and Commitments table references G6 and G7 within the First Iteration Environmental Management Plan [APP-127]. The Applicant has committed to developing and adhering to a communication plan prior to work commencing on-site. This commitment is detailed in the REAC within the First Iteration Environmental Management Plan [APP-127] table reference

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		G3. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. The Scheme will install temporary accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use Egypt Lane and Simister Lane. There will be the requirement to access from the Egypt Lane and Simister Lane for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology, and the installation of boundary fencing. After the work area has been established then the temporary accesses and egresses into the offline work areas will be utilised. The cable percussion drilling rig will be the largest of the equipment to be used to facilitate construction of the Scheme. The Applicant notes that heavy plant and machinery was likely used to construct the telephone mast references, however no heavy-duty vehicles will use Simister Lane/Egypt Lane during the establishment of work areas. The use of Simister Lane/Egypt Lane is reserved for light duty vehicles only during early enabling works phase. The Scheme will install temporary accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use Egypt Lane and Simister Lane. There will be the requirement to access from the Egypt Lane and Simister Lane for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology, and the installation of boundary fencing. After the work area has been established then the temporary accesses and egresses into the offline work areas will be utilised. The cable percussion drilling rig will be the largest of the equipment to be used to facilitate construction of the Scheme. The Applicant notes that heavy plant and machinery was likely used to construct the telephone mast references, however no heavy-duty vehicles will use Simister Lane/Egypt Lane during the establishment of work areas. The use of Simister Lane/Egypt Lane is reserved for light duty vehicles only during early enabling works phase. Additionally, access from Egypt Lane and Simister Lane for the establishment of work areas will only be undertaken during daytime working hours. Daytime working hours are defined within commitment G4 in the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [APP-127].
RR-022 - Lorraine Eagling		
RR-022	*I object to the proposed scheme at Simister Island Interchange. It is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and*	The Applicant acknowledges that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments in the First Iteration Environmental

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	noise pollution already faced by local people, this scheme would make things worse for many local residents. St Margaret's C of E Primary School is only 200m from the M62, while Parrenthorn High School is only 300m away (and a similar distance from the M60) so both will be negatively impacted by this scheme. National Highways have only ever proposed or examined variations of a road building proposal, never non-roadbuilding alternatives to reduce demand or its impact. Construction will take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents. Night time motorway closures will transfer traffic onto the local road network, increasing noise and disturbance for local residents. There will be an increase in noise at Kenilworth Avenue, Warwick Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane. The scheme would lead to an increase in fatal, serious and slight casualties. With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road. There are no significant benefits to the scheme, only small time savings. This results in the scheme being low value for money with a Benefit to Cost Ratio of just 1.17. The scheme barely pays its way, with every £1 spent on the scheme, taxpayers only see £1.17 of benefits. This situation could easily change with any cost overruns. 68 hectares of land surrounding Junction 18 is in the Green Belt. Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over 60 years due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so.	Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening. This is unlikely to be noticeable but still amounts to a reduction on current levels. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60 significant adverse construction noise effects are predicted during both day and night-time working during online works (works on the carriageway) when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilisation and online works when these works are within around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane significant adverse construction noise effects are predicted during both day and night-time working during mobilization, and during the night-time period during online and offline works (works off the carriageway). For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilisation and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. By way of compensation for the impact that construction works can have on properties or individuals, the Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called '*Your property and compensation or mitigation for the effects of our road proposals*' sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in '*Your property and our road proposals*'. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains the Register of Environmental Actions and Commitments, that includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may

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		affect residents. Chapter 8 Biodiversity of the Environmental Statement [APP-047] provides a full assessment of the effects on wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. Chapter 8 Biodiversity of the Environmental Statement [APP-047] details the embedded and essential mitigation required to offset impacts. These measures are set out within the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 8: Biodiversity of the Environmental Statement [APP-047] concludes that there would be no significant effects (i.e. moderate, large or very large effects) once mitigation has been taken into account, on any biodiversity receptor due to construction and operation of the Scheme. Chapter 5 Air Quality of the Environmental Statement [APP-044], and Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079], provide details of the methodology used to assess air quality impacts as a result of the Scheme. Chapter 5 Air Quality of the Environmental Statement [APP-044] also sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. The methodology followed is in accordance with National Highways' DMRB LA 105 (Air quality). Modelled traffic data for the Scheme opening year (2029) is used to undertake detailed modelling of air pollution both with and without the Scheme. As monitoring cannot be undertaken for future years, modelling is used. The resulting predicted concentrations are then compared with the UK air quality objectives and limit values for air quality for nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), which are discussed and presented in Chapter 5 Air Quality of the Environmental Statement [APP-044]. In addition, a past year is also modelled (in this case 2018 to reflect the base year traffic data) using the same methodology and the results compared to monitored air pollution data for the same year (2018) to confirm that the methodology provides robust predictions. Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079] provides details of nitrogen dioxide monitoring data, which includes some local authority monitoring. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). Dust from construction is discussed in section 5.8 of Chapter 5 Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' and therefore mitigation measures have been set out in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127], which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005].The Applicant notes the reference to high incidence of respiratory disease in Blackley. The ward of Higher Blackley was excluded from the population health profiles presented in Chapter 12: Population and Human Health of the Environmental Statement [APP-051] as the distance between the residential population and the Scheme is over 1km (paragraph 12.15.2). Respiratory health indicators were considered in the health profiles for other wards in the study area, for example Besses ward has significantly higher than average deaths from respiratory disease and emergency admissions for chronic obstructive pulmonary disease. While it is not the role of the assessment to investigate high incidences of respiratory diseases, this information did inform the judgement that the population is of high sensitivity to health impacts as shown in Tables 12.29 and 12.32 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. The human health assessment did not predict any significant effects on population health due to changes in air quality as a

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		result of the Scheme since the changes in concentrations of key pollutants would be small or imperceptible and would be within statutory standards as set out in paragraphs 12.18.70 – 12.18.74 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit which have been removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct will no longer be within the Green Belt following its removal by PfE. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Applicant has undertaken assessments to ensure that the Scheme design is being developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details can be found in the Transport Assessment [APP-149].

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		The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified BCR of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 which sets out up to date statistics for the strategic road network "In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds

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		per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)." Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at Simister will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following "This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location." Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by

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		2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-023 - David Frankal		
RR-023a	*I am writing as an individual (long-time and soon returning resident of Greater Manchester). I oppose this project as I believe it is fundamentally irresponsible to plough such sums of money into yet more road expansion at a time of climate emergency, when we urgently need to be funding rail, tram, bus and active travel improvements in Greater Manchester and across the country.*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives.
RR-023b	*Expanding the junction will not reduce congestion, as it will simply induce more demand on the already overcrowded M60, M62 and M66. Efforts should instead be focused on reducing demand for road transport and providing suitable alternatives.*	The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays Further details can be found in the Transport Assessment [APP-149]. In line with Department for Transport, Transport Analysis Guidance, modelling work has been undertaken to understand how the Scheme is likely to perform using Department for Transport's traffic forecasts. Three future year traffic models were developed which were also used to undertake the economic and environmental assessments. The traffic models were developed for 2029 (Scheme opening year), 2044 (Scheme design year, 15 years after Scheme opening) and 2061 (the final year for which Department for Transport has published traffic growth forecast). The traffic models were developed using the Department for Transport's National Trip End Model, which considers national projections in population, employment, housing, car ownership and trip rates. The National Trip End Model forecasts increases in traffic within Greater Manchester and the traffic model forecasts how this will contribute to increases in delay/congestion in the vicinity of M60 junction 18. If nothing is done, congestion is forecast to increase on routes around M60 junction 18 and the strategic road network. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. Traffic modelling, which includes the modelling of induced traffic effects, indicates that the network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic within the vicinity of M60 junction 18. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. The Applicant is responsible for improvements to the strategic road network (motorways and major A-roads), which includes this Scheme. Improvements to public transport in Greater Manchester would be the remit of Transport for Greater Manchester and local authorities. However, through the junction and capacity improvements the Scheme will improve journey time reliability for a number of bus routes that serve both the local community and longer journeys towards Bury to

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		the north and Manchester city centre to the south. Two routes which use the M60 junction 18 are the X41 service connecting Manchester city centre with Accrington, and the X43 service which connects Manchester city centre with Burnley. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives.
RR-024 - Leane Donoghue-Horrocks		
RR-024	*concerned about how close this will be to the houses at the bottom of parrenthorn*	The Applicant notes the concerns regarding proximity of works to Parrenthorn Road and Parrenthorn High School. Section 11.10 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-050] sets out the assessment of likely significant effects on noise and vibration during construction and operation of the Scheme. For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilisation and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments , which includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents.
RR-025 - Anthony John Gildea		
RR-025	*I believe the scheme is to improve the flow of traffic through or on the M60 and M62. The bottleneck primarily is the stretch of Motorway between J18 and J12 westbound through what is known locally as Death Valley. I do not believe this scheme will address this. The scheme as outlined WILL help reduce the congestion anti-clockwise on the M60 and Eastbound on the M62.*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging

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		between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through additional capacity increases on the M60 junction 17 to junction 18 mainline and at the junction (impacting traffic travelling Eastbound and Westbound). The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic within the vicinity of M60 junction 18. Those travelling through M60 junction 18 will experience improved travel times as a result of the Scheme. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. Improvements to other areas of the M60, such as those included in the Relevant Representation (Junction 17 to Junction 12), are not within the scope of the Scheme.
RR-026 - Christopher Gillham		
RR-026	*The necessary transport decarbonisation trajectory cannot be achieved without significant traffic reduction. This scheme increases capacity and leads to induced traffic. The recent High Court judgment Friends of the Earth Ltd; Ors v Secretary of State for Energy Security and Net Zero [2024] EWHC 995 (Admin) shows there is no headroom for additional emissions and that it is 'irrational' for the government to assume that other sectors can make up for over emissions of the transport sector. This proposal solves no problem and is not fit for twenty-first century transport policy. The Applicant will not have considered non-road alternatives.*	Two sets of NPS NN accordance tables have been provided by the Applicant and are in the examination library. Theycover the January 2015 designated version of the NPS NN [APP-147] and the draft version of the NPS NN as at March 2023 [APP-148]. The latter was the most recent version of the NPS NN at the time of submission which was subsequently designated in May 2024. Therefore, an additional submission was accepted at the discretion of the Examining Authority [AS-007] which provided a comparative assessment of the designated and draft version of the most recent NPS NN designated in May 2024. The Applicant has accordingly assessed the Scheme against all climate and carbon related aspects of the NPS NN. Carbon emissions are covered by paragraphs 5.17-519 of the NPS NN (designated January 2015) and paragraph 5.18 states: *"The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan. Therefore, any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets".* With regard to the estimated increase in road user greenhouse gas emissions as a result of the Scheme, paragraph 5.41 of the NPS NN designated in May 2024 states that "*Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational carbon emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework*". Furthermore, paragraph 5.42 of the NPS NN designated in May 2024 states "*Operational emissions will be addressed in a managed, economywide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero. However, where the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of government to achieve its statutory carbon budgets, the Secretary of State should refuse consent*". In accordance with the NPS NN (both versions designated in January 2015 and May 2024), estimated changes in

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		greenhouse gas emissions because of the Scheme have been compared to UK carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through additional capacity increases on the M60 junction 17 to junction 18 mainline and at the junction (impacting traffic travelling Eastbound and Westbound). The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic within the vicinity of M60 junction 18. Commuters through M60 junction 18 will experience improved travel times as a result of the Scheme. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. In line with Department for Transport, Transport Analysis Guidance, modelling work has been undertaken to understand how the Scheme is likely to perform using Department for Transport's traffic forecasts. Three future year traffic models were developed which were also used to undertake the economic and environmental assessments. The traffic models were developed for 2029 (Scheme opening year), 2044 (Scheme design year, 15 years after Scheme opening) and 2061 (the final year for which Department for Transport has published traffic growth forecast). The traffic models were developed using the Department for Transport's National Trip End Model, which considers national projections in population, employment, housing, car ownership and trip rates. The National Trip End Model forecasts an increase in traffic rather than a reduction (within Greater Manchester around 9% from 2018-2029, 15% from 2018-2044 and 20% from 2018-2061) and this is likely to contribute to increases in delay/congestion in the vicinity of M60 junction 18. If nothing is done, congestion will increase on routes around M60 junction 18 and the major road network, thus the Scheme is required to resolve the identified traffic related problems. The Scheme seeks to improve these issues through additional capacity increases on the M60 junction 17 to junction 18 mainline and at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic within the vicinity of M60 junction 18. Commuters through M60 junction 18 will experience improved travel times as a result of the Scheme. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives.
RR-027 - John Goacher		
RR-027	*The scheme has changed to include the widening through whitefield. I*	The Applicant confirms that changes were made to the Scheme following Statutory Consultation to remove works from the

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	am concerned about the increase in noise due to the scheme and looking for the scheme to include mitigation inc. sound dampening barriers.	Whitefield area, specifically in land adjacent to Whitefield golf course, west of M60 J17. Provision of a new hard shoulder, in addition to the number of running lanes on each carriageway of the M60 between junction 17 and 18, being increased from four to five, has been fully assessed in the Environmental Statement. Specifically, Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes consideration of mitigation for road traffic noise. Noise mitigation measures are considered in the order of source/path/receptor, with examples of mitigation at source being road surfacing and path including noise barriers or earth bunds. This is because noise mitigation at source benefits a wider area then the other forms of mitigation. A "Low Noise Road Surface" with better performance than a conventional low noise surface would be provided between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment of changes in road traffic noise with this mitigation indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes between M60 J17 and where the M60 crosses A665 Bury Old Road are predicted to be of less than 1dB,and are not considered to be significant. Changes from A665 towards M60 J18 are larger and of up to 5dB. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. As the installation of low noise road surface with better performance than a conventional low noise road surface is predicted to reduce road traffic noise levels with no resulting significant adverse effects additional mitigation is not considered necessary.
RR-028 - Jayne Lizbeth Harrison		
RR-028	*Catastrophic environmental impact on a small village od 300 homes*	The Applicant has undertaken an environmental impact assessment (EIA) which is set out in the Environmental Statement along with its associated Figures and Appendices [APP-040 to APP-126] which accompanies the application for development consent. The Environmental Statement sets out how the Applicant has considered the environmental impacts as a result of the Scheme and the measures identified to avoid or reduce environmental effects where practicable. The Applicant in undertaking the design sought to avoid or reduce impacts to environmental receptors, as documented within Chapter 3: Assessment of Alternatives of the Environmental Statement [APP-042] and technical chapters 5 to 15 of the Environmental Statement [APP-044 to APP-054]. The Scheme will also provide environmental enhancements, for example habitat creation which will provide an increase in habitats as evidenced by Appendix 8.12: Biodiversity Net Gain (BNG) Report of the Environmental Statement Appendices [APP-102]. The First Iteration Environmental Management Plan [APP-127] contains the Register of Environmental Actions and Commitments which details how the mitigation measures will be delivered. The First Iteration Environmental Management Plan [APP-127] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005].
RR-029 - Julie Hay		
RR-029	*I object to the proposed scheme at Simister Island Interchange. Given Greater Manchester's adopted spatial plan will release more than 2,400 hectares of Green Belt for development any additional loss of greenbelt and green space (as proposed) is unacceptable. National Highways should be looking for alternative solutions to reduce demand (ie rail options) and not simply exacerbating the problems of traffic pollution by inducing more traffic (always happens) by expanding road provision. Pollution for the area's communities - densely populated-is already exceeding legal levels. Carbon emissions will vastly increase in contradiction of the stated aims of central government, Greater Manchester Authority and boroughs within it.*	Responses are provided below, in turn, to each of the points raised within the relevant representation. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound

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		diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 will remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct will no longer be in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time and the lack of alternatives with less impact on the Green Belt. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-

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		127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-030 - Paula Jane Hickey		
RR-030	*Poor air quality and local respiratory disease rates Loss of biodiversity and habitats Increased noise level Increased level of Particulates contributing to local ill health*	Chapter 12 Population and Human Health of the Environmental Statement [APP-051] provides an assessment of the likely significant effects of the Scheme on human health. The local health profile reported in Table 12.29 of Chapter 12 Population and Human Health of the Environmental Statement; [APP-051] does identify poor respiratory health indicators for Besses ward, although the indicator values for the neighbouring wards are not significantly different from the average for England. Paragraphs 12.18.68 – 12.18.88 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051] describe the impacts of air pollution expected during operation of the Scheme. The predicted changes in particulates are assessed as 'imperceptible' in the air quality assessment presented in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore it is assessed that there would be no significant effect on population health. The provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitmentscontained in the First Iteration Environmental Management Plan [APP-127] has been assessed as significantly positive for human health outcomes as set out in paragraphs 12.18.89 – 12.18.95 and the accompanying Tables 12.36 and 12.37 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051].Chapter 8: Biodiversity of the Environmental Statement [APP-047] provides an assessment of the construction and operation effects of the Scheme on biodiversity receptors. The Applicant acknowledges that the construction of the Scheme has the potential to result in a temporary and permanent loss of terrestrial habitats (Paragraph 8.8.2 of Chapter 8: Biodiversity of the Environmental Statement [APP-047]. As detailed in Paragraph 8.9.7 of Chapter 8: Biodiversity of the Environmental Statement [APP-047], the Scheme would be landscaped in accordance with Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-057] which would mitigate these habitat losses. The Applicant concludes that there would be no significant effects on any biodiversity receptor, including habitats, due to construction or operation of the Scheme (Table 8.18 and 8.19 of Chapter 8: Biodiversity of the Environmental Statement [APP-047]. In addition, the Applicant has undertaken a biodiversity net gain assessment (Appendix 8.12: Biodiversity Net Gain Report of the Environmental Statement Appendices [APP-102] which, based on the preliminary design, predicts that the Scheme will achieve a net gain in the value of habitats lost as a result of the Scheme (3.68% for area habitats and 58.50% for hedgerows).

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RR-031 - Ward Hadaway LLP on behalf of the Hillary Family		
RR-031a	*Application by National Highways Limited for the M60/M62/M66 Simister Island Interchange Development Consent Order 202[ ]. Section 56 of the Planning Act 2008: Relevant Representation of John Hillary and David Hillary Ward Hadaway LLP is instructed to act on behalf of John Hillary and David Hillary (the Hillarys), who are the joint owners of the freehold title to land at Egypt Lane, Whitefield under title number GM706922 (the Hillary Land).* *The Application seeks the permanent and temporary acquisition of land and rights comprised in the Hillary Land. This Relevant Representation follows the Hillarys' two written responses to the Applicant's Sections 42/44 consultation, the latter such response is reproduced at Annex Q of the Applicant's Consultation Response (Examination Library Ref: APP-038 at E238). Full copies of the Hillarys' two written responses, and plans referred to therein, will be provided as part of the Examination.* *As the ExA is aware, the Places for Everyone (PfE) Plan Joint Development Plan 2022 to 2039 was adopted on 21 March 2024. Policy JPA 1.1 of PfE allocates the Hillary Land (and other land) as a large, nationally significant location for new employment-led development within what is known as the Northern Gateway opportunity area, between Bury and Rochdale. Policy JPA 1.1 recognises that the scale of the opportunity will help to deliver a significant jobs boost to wider northern and eastern parts of the conurbation, increasing the economic output from this area and helping to rebalance the Greater Manchester economy. It also includes the potential to deliver a significant amount of new housing as well as an appropriate range of supporting and ancillary services and facilities. Bury Council has commenced the production of a development framework in the form of a Masterplan and SPD, as required by Requirement 1 of Policy JPA 1.1. The JPA 1.1 allocation also sits within the wider North-East Growth Corridor (PfE Policy JP-Strat 7), which "extends eastwards from Junction 18 of the M62 and incorporates the Atom Valley Mayoral Development Zone to deliver a nationally significant area of economic activity", which "will be supported by a significant increase in the residential offer, thereby delivering truly inclusive growth over the lifetime of the Plan". The Atom Valley MDZ was formally designated by the Greater Manchester Combined Authority on 29 July 2022, and is one of six 'Growth Locations' across Greater Manchester that is designed to deliver new development, create and retain jobs, offer better job opportunities, enable training and skill development to increase the number of residents in employment. The purpose of the Atom Valley MDZ is to provide a clear mechanism to align public and private sector investment and ensure that there is commitment to the principle to delivering*	The Applicant acknowledges the relevance that the Simister Island area and the Scheme has to Places for Everyone (PfE) and the proposals within this plan for the Northern Gateway. Further details on how the Scheme supports the PfE can be found in Chapter 6 of the Case for the Scheme [APP-146]. The Scheme has also taken into account the requirements of the local development plan, which is the Bury Unitary Development Plan (UDP) and PfE. Overall, providing additional capacity on the strategic road network aligns with the objectives of these plans which promote significant amounts of new housing and employment developments in the surrounding area over the period to 2039 and beyond. A cumulative assessment which assesses the impact of the Scheme in combination with other developments can be found in Chapter 15: Assessment of Cumulative Effects of the Environmental Statement [APP-054]. This is supported by Appendix 15.1 Inter-Project Cumulative Effects of the Environmental Statement Appendices [APP-125]. This assessment has been carried out in accordance with the Planning Inspectorate's (2019) Advice Note Seventeen: Cumulative Effects Assessment. The assessment sets out how the effects of the Scheme will combine and interact with the effects of other development projects, whether existing, awaiting consent, already consented or otherwise reasonably foreseeable. This includes any land with full or outline planning permission, local plan allocations and other Nationally Significant Infrastructure Projects . Part of the proposed JP allocation 1.1 for Heywood/Pilsworth falls within the Order Limit where construction of the Northern Loop will take place. This overlap has been discussed with Bury Metropolitan Borough Council including representative from the planning, legal, highways and land and property departments. These discussions have established the Scheme does not compromise the delivery of the Northern Gateway. It should be noted that the Northern Gateway will be accessed from the local road network and there are alterations to the strategic road network that will provide new access arrangements. The part of the strategic allocation within Rochdale, west of M60/M62 J19, already has planning permission under reference 16/01399/HYBR for: part full/part outline planning application for the development of land at South Heywood, including the demolition of a number of existing on-site buildings and structures. Full consent has been sought for the construction of a new link road between Junction 19 of the M62 and Pilsworth Road and the widening of part of Pilsworth Road, together with associated works. Outline consent (all matters reserved for except access) for a major mixed-use development comprising up to 1000 dwellings; employment uses (Classes B2/B8); a new primary school; employment land; associated landscaping, open space and sports pitches, drainage, ecological enhancements, cycleway and footpath linkages, infrastructure and other ancillary works. This permission has been triggered with numerous subsequent permissions for non-material amendments, reserved matters and discharging conditions. The general direction of development of Heywood/Pilsworth will be from north to south with some plots developed beyond the current plan period for PfE. The Core Scenario used for modelling future traffic in the Transport Assessment [APP-149] takes into account land which has planning permission. This includes the part of the Northern Gateway in Rochdale under reference 16/01399/HYBR including the new link road which connects to M60/M62 Junction 19. This is shown on Figures 2.10, Large Housing Sites Included in the Traffic Model and Figure 2.12, Highway Infrastructure Schemes Included in the Traffic Model of the Transport Assessment [APP-149]. The other aspects of the Northern Gateway currently under consideration in PfE are not included in the model. However, the implementation of the Scheme will provide sufficient additional strategic road network capacity to accommodate this should planning permission be granted in the future The Case for the Scheme [APP-146] at Section 5 sets out that with the Scheme in place ("do something") the wider economic aspirations of the Mayor for Greater Manchester, including those relating to the Northern Gateway and the Atom Valley MDZ, will benefit from journey time savings that would otherwise get worse without the Scheme ("do nothing"). The design of the Scheme would not compromise the ongoing delivery of the wider Northern Gateway which is supported in principal by policy JP1.1 of PfE and as noted above the part of the Northern Gateway in Rochdale already has planning

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	inclusive and sustainable growth.	permission.
RR-031b	*The Hillarys welcome the ExA's request for the Applicant to review its Application documents in light of the adoption of PfE. The Hillarys maintain and reiterate the following concerns in respect of the Applicant's proposed scheme insofar as it relates to the Hillary Land:* *- The Hillarys fundamentally reject any compelling need for environmental mitigation (in the form of biodiversity net gain) to be located on Plot 2/16b (Work 36) and/or Plot 2/16d (Work 38).The proposed land-takes equate to approximately 5.4ha and 5.3ha respectively. Environmental mitigation remains an element of the scheme which can be provided elsewhere within the current or an extended project boundary, or located off-site. The Applicant's Case for the Scheme itself acknowledges that there is no requirement for the scheme to provide biodiversity net gain (APP-147 at paragraph 6.11.32. It is plain therefore that the test in Section 122 PA 2008 is not made out in respect of such parts of Plot 2/16b or Plot 2/16d as are proposed for environmental mitigation*	The Applicant confirms that the construction of the Scheme will result in impacts to biodiversity and visual and landscape receptors. Of relevance to Plots 2/16b and 2/16d in the north-east quadrant are impacts to bats from loss of hedgerows used for commuting and foraging, and potential impacts from collision with vehicles during operation of the northern loop. Of relevance to landscape character are impacts to LCA 26: Prettywood, Pilsworth and Unsworth Moss. Of relevance to visual amenity are visual impacts to residents, walkers on footpaths and visitors to Pike Fold Golf Course (VP3, VP4, VP5 and VP7) identified in Table 7.7 in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and shown on Figure 7.5, Representative Viewpoints and Photomontage Locations, of the Environmental Statement Figures [APP-066]. These impacts need to be offset by essential environmental mitigation. This land is required for that essential mitigation rather than the provision of biodiversity net gain. The environmental mitigation located within Plots 2/16b and 2/16d includes hedgerow planting to mitigate impacts to bats. As shown on Figure 8.3.3, Bat Activity Visualisation, of the Environmental Statement Figures [APP-091] some of the highest levels of bat activity recorded across the study area were within these plots. Planting of hedgerows in these locations will help to guide bats around the northern loop and prevent impacts from mortality due to collision with vehicles. The mitigation planting in these land plots also includes small blocks of mixed broadleaf woodland to break up the scale of the motorway to reduce visual disturbance from the traffic flows on the junction, screen visual impacts from the north-east and integrate the Scheme into the local landscape. As such, this hedgerow and woodland planting has to be located in these land plots in order to achieve its intended purpose. In addition, of relevance to the entire Scheme, including the north-east quadrant, is loss of habitats including lowland mixed deciduous woodland (priority habitat), broadleaved woodland, modified grassland, other neutral grassland and scrub, In the absence of mitigation, loss of habitats would result in a significant adverse impact. The extent and boundaries of acquisition of plots 2/16b and 2/16d is driven by the temporary works areas during construction when these plots will be utilised for temporary material storage areas. The Applicant will therefore need to remediate this land post construction. The ability to control and manage the remediation of this land will enable the Applicant to ensure the optimum conditions for establishment of this mitigation planting. In summary, the mitigation areas in the north-east quadrant are required for the purpose of essential mitigation and have not been included specifically for the purpose of biodiversity net gain, although the habitats created for the bat and landscape mitigation do contribute to the net gain figure predicted for the Scheme. The Applicant agrees that there is no statutory requirement for biodiversity net gain for Nationally Significant Infrastructure Projects at the current time, and as such no land is proposed to be compulsorily acquired specifically to provide biodiversity net gain. The case for compulsory acquisition and how the Scheme meets the tests under section 122 of the Planning Act 2008 is set out in the Statement of Reasons [APP-018]. The Applicant confirms that Plots 2/16b and 2/16d as shown on the Land Plans [AS-005] are required to deliver essential environmental mitigation to offset the impacts of the Scheme rather than to deliver biodiversity net gain. The Applicant has however sought where possible to maximise the benefits from any essential mitigation. This includes by re-planting more than is lost to the Scheme meaning that the essential mitigation also adds to the Scheme's biodiversity net gain.
RR-031c	*- The Hillarys consider that the locations of the attenuation pond and drain immediately to the east of the Northern Loop (Work 37) can be drawn tighter to the Northern Loop itself, with temporary haul routes*	The location of Pond 1 has been identified through hydraulic modelling (modelling of water flow, water level and speed of water in pipe networks) along with consideration of the location of existing ponds and considering increases in rainfall intensity associated with climate change. Further details of the outcome of the modelling can be found in Chapter 13 Road

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	and temporary footpath diversions routed outside of these and within Plot 2/16d (with temporary possession of part of Plot 2/16d for that purpose).	Drainage and the Water Environment of the Environmental Statement [APP-052]. The ponds are also required for water treatment. A detailed assessment of water quality has been carried out as part of the environmental impact assessment for construction and operation of the Scheme and is reported in Appendix 13.2. Water Quality Assessment Report of the Environmental Statement Appendices [APP-117]. Alternate options have been considered for Pond 1, including within the loop, however those options were found to not perform as well as the current position.
RR-031d	*- As above, the Hillarys fundamentally reject any compelling need for environmental mitigation to be located on Plot 2/16b (Work 36) and/or Plot 2/16d (Work 38). It follows that the acquisition of permanent rights over Plot 2/16c and/or Plot 2/16c continues to risk sterilising the balance of Plot 2/16b (insofar as it is not required for the formation of the Northern Loop itself). The Hillarys intend to rely on the Hillary Land's allocation for development within PfE and its designation within the Atom Valley MDZ (as well as any actual additional planning permissions / development orders (or the likelihood of obtaining the same)) in any calculation or assessment of the value of any land acquired or possessed pursuant to the Applicant's Project.*	The Applicant confirms that the construction of the Scheme will result in impacts to biodiversity and visual and landscape receptors. Of relevance to Plots 2/16b, 2/16c and 2/16d in the north-east quadrant are impacts to bats from loss of hedgerows used for commuting and foraging, and potential impacts from collision with vehicles during operation of the northern loop. Of relevance to landscape character are impacts to LCA 26: Prettywood, Pilsworth and Unsworth Moss. Of relevance to visual amenity are visual impacts to residents, walkers on footpaths and visitors to Pike Fold Golf Course (VP3, VP4, VP5 and VP7) identified in Table 7.7 in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and shown on Figure 7.5, Representative Viewpoints and Photomontage Locations, of the Environmental Statement Figures [APP-066]. These impacts need to be offset by essential environmental mitigation. This land is required for that essential mitigation rather than the provision of biodiversity net gain. The environmental mitigation located within Plots 2/16b and 2/16d includes hedgerow planting to mitigate impacts to bats. As shown on Figure 8.3.3, Bat Activity Visualisation, of the Environmental Statement Appendices [APP-091] some of the highest levels of bat activity recorded across the study area were within these plots. Planting of hedgerows in these locations will help to guide bats around the northern loop and prevent impacts from mortality due to collision with vehicles. The mitigation planting in these land plots also includes small blocks of mixed broadleaf woodland to break up the scale of the motorway to reduce visual disturbance from the traffic flows on the junction, screen visual impacts from the north-east and integrate the Scheme into the local landscape. As such, this hedgerow and woodland planting has to be located in these land plots in order to achieve its intended purpose. In addition, of relevance to the entire Scheme, including the north-east quadrant, is loss of habitats including lowland mixed deciduous woodland (priority habitat), broadleaved woodland, modified grassland, other neutral grassland and scrub, In the absence of mitigation, loss of habitats would result in a significant adverse impact. The extent and boundaries of acquisition of plots 2/16b and 2/16d is driven by the temporary works areas during construction when these plots will be utilised for temporary material storage areas. The Applicant will therefore need to remediate this land post construction. The ability to control and manage the remediation of this land will enable the Applicant to ensure the optimum conditions for establishment of this mitigation planting. In summary, the mitigation areas in plots 2/16b and 2/16d are required for the purpose of essential mitigation and have not been included specifically for the purpose of biodiversity net gain, although the habitats created for the bat and landscape mitigation do contribute to the net gain figure predicted for the Scheme. The Applicant agrees that there is no statutory requirement for biodiversity net gain for Nationally Significant Infrastructure Projects at the current time, and as such no land is proposed to be compulsorily acquired specifically to provide biodiversity net gain.
RR-031e	*The Hillarys are continuing to review the Applicant's plans, draft Order and Application documents, and are prepared to enter into negotiations with the Applicant in respect of a voluntary agreement for the disposal of such land and rights as is necessary for the construction of the Northern Loop itself (excluding land sought for environmental mitigation*	The Applicant spoke with a representative from the Hillary family at the time of Section 56 notification. The Applicant acknowledged the mutual intent to enter into negotiations in respect of a voluntary agreement for the disposal of such land as is necessary for the construction of the Northern Loop. The Applicant notes responses above which set out the intended use of land sought for environmental mitigation including

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	and for the attenuation pond and drain). The Examining Authority and the Secretary of State will otherwise need to be satisfied that the land and rights proposed to be acquired from the Hillarys is truly required to facilitate, or is incidental to, the scheme, and (critically) that there is a compelling case in the public interest for the land to be acquired compulsorily. The Hillarys respectfully request that the ExA treats them as an Interested Party for the purposes of the Examination and reserve the right to produce additional and further grounds of concern when further details of the Scheme and its effects on the Hillary Land are available.	attenuation pond 1.
RR-032 - Ian Hillary		
RR-032a	*The use of land in the proposal is not space efficient and will increase the cost of the scheme, not representing the best value for public money.*	The proposed use of land by the Applicant, outlined in the Land Plans [AS-005] and documented in the Statement of Reasons [APP-018] is based on the requirements of both the temporary and permanent works. The Statement of Reasons [APP-018] including Annex A sets out why the land is needed for construction and operation of the Scheme with reference to the Works Plans [AS-006], Land Plans [AS-005] and Schedule 1 of the draft Development Consent Order [PD-005]. More specifically, the Statement of Reasons [APP-018] outlines why each parcel of land identified on the Land Plans [AS-005] and documented in the Book of Reference [AS-010] is required by the Scheme. The preliminary design of the Scheme, presented by the Applicant in the application for development consent, shows a holistic combination of highway link design, all associated civil and structural elements and for the efficient delivery of environmental mitigation such as landscape planting for visual mitigation. Collectively, these elements of the preliminary design and the associated land assembly, are required due to a combination of design standards, such as those that form National Highways' DMRB, legal requirements, such as those dictated by the Environment Agency, and planning requirements, as stipulated in the NPS NN (both versions designated in January 2015 and May 2024).
RR-032b	*Attenuation Pond 1 could be located closer to the loop or within the inner area of the Northern Loop. The proposed location of Pond 1 is not space efficient.*	The location of Pond 1 has been identified through hydraulic modelling (modelling of water flow, water level and speed of water in pipe networks) along with consideration of the location of existing ponds and considering increases in rainfall intensity associated with climate change. Further details on the outcome of the modelling can be found in Chapter 13 Road Drainage and the Water Environment of the Environmental Statement [APP-052]. The ponds are also required for water treatment. A detailed assessment of water quality has been carried out as part of the environmental impact assessment for construction and operation of the Scheme and is reported in Appendix 13.2. Water Quality Assessment Report of the Environmental Statement Appendices [APP-117]. Alternate options have been considered for pond 1, including within the loop, however these options were found to not perform as well as the current position.
RR-032c	*The proposed environmental mitigation area in the north-east quadrant is not justified. There is no requirement for Biodiversity Net Gain on schemes granted permission by a development order. There is no reference in the scheme documents to the actual area of land area required for environmental mitigation. The proposed environmental mitigation area in the north-east quadrant disproportionally affects one landowner, whilst other landowners have remained unaffected. The land taken in the proposal has been defined arbitrarily based on existing field boundaries and ownership, and not rationalised with specific area requirements, calculation methodology or space efficiency. The land take is not space efficient and it appears to be based unfairly on land ownership. This land is currently well-maintained farmland, with a pleasing visual amenity. If this becomes an*	The Applicant confirms that the construction of the Scheme will result in impacts to biodiversity and visual and landscape receptors. Of relevance to the north-east quadrant are impacts to bats from loss of hedgerows used for commuting and foraging, and potential impacts from collision with vehicles during operation of the northern loop. Of relevance to landscape character are impacts to LCA 26: Prettywood, Pilsworth and Unsworth Moss. Of relevance to visual amenity are visual impacts to residents, walkers on footpaths and visitors to Pike Fold Golf Course (VP3, VP4, VP5 and VP7) identified in Table 7.7 in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and shown on Figure 7.5, Representative Viewpoints and Photomontage Locations, of the Environmental Statement Figures [APP-066]. These impacts need to be offset by essential environmental mitigation. This land is required for that essential mitigation rather than the provision of biodiversity net gain. The environmental mitigation located within the north-east quadrant includes hedgerow planting to mitigate impacts to bats. As shown on Figure 8.3.3, Bat Activity Visualisation, of the Environmental Statement Appendices [APP-091] some of the

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	environmental mitigation area, it will be at risk to fly-tipping, which is prevalent in the local area. Invasive plants such as Ragwort will take over and cause further spread into the neighboring fields used for cattle and horse grazing.	highest levels of bat activity recorded across the study area were within this area. Planting of hedgerows in these locations will help to guide bats around the northern loop and prevent impacts from mortality due to collision with vehicles. The mitigation planting in these land plots also includes small blocks of mixed broadleaf woodland to break up the scale of the motorway to reduce visual disturbance from the traffic flows on the junction, screen visual impacts from the north-east and integrate the Scheme into the local landscape. As such, this hedgerow and woodland planting has to be located in these land plots in order to achieve its intended purpose. In addition, of relevance to the entire Scheme, including the north-east quadrant, is loss of habitats including lowland mixed deciduous woodland (priority habitat), broadleaved woodland, modified grassland, other neutral grassland and scrub, In the absence of mitigation, loss of habitats would result in a significant adverse impact. The extent and boundaries of acquisition of land in the north-east quadrant is driven by the temporary works areas during construction when these plots will be utilised for temporary material storage areas. The Applicant will therefore need to remediate this land post construction. The ability to control and manage the remediation of this land will enable the Applicant to ensure the optimum conditions for establishment of this mitigation planting. In summary, the mitigation areas in the north-east quadrant are therefore required for the purpose of essential mitigation and have not been included specifically for the purpose of biodiversity net gain, although the habitats created for the bat and landscape mitigation do contribute to the net gain figure predicted for the Scheme. The Applicant agrees that there is no statutory requirement for biodiversity net gain for Nationally Significant Infrastructure Projects at the current time, and as such no land is proposed to be acquired specifically to provide biodiversity net gain. However, the Applicant is seeking to maximise the opportunities for delivering biodiversity net gain including where is it proposing to compulsorily acquire land for essential environment mitigation purposes by replacing more than that lost as a result of the Scheme. The Applicant acknowledges the concerns in relation to fly-tipping but does not accept / believe / anticipate that the mitigation planting areas would be at any higher risk of fly tipping than at present. The planting in these areas will be maintained and managed long-term in accordance with the Landscape and Ecology Management Plan which will be developed from the Outline Landscape and Ecology Management Plan [APP-141], contained within Appendix N of the First Iteration Environmental Management Plan [APP-127]. The Applicant acknowledges the concerns relating to invasive plant species and ragwort. Ragwort is not an invasive species, common ragwort *Senecio jacobaea* is a native species of the British Isles and is very important for wildlife in the UK, supporting a wide variety of invertebrates and providing a major source of nectar for insects, however it is toxic if eaten by livestock and other grazing animals (Code of Practice on How to Prevent the Spread of Ragwort, Defra 2004). As such, the Applicant acknowledges its duties as a landowner under the Weeds Act 1959 and the Ragwort Control Act 2003 and would seek to manage the presence and distribution of any common ragwort which becomes established within the Order Limits in accordance with legal obligations. The Applicant will undertake pre-construction surveys for invasive species as secured by Requirement 4 of the draft Development Consent Order [PD1-005] in relation to implementation of the First Iteration Environmental Management Plan [APP-127] and associated management plans including Appendix E: Outline Invasive Species Management Plan [APP-132]. Commitment B13 of the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] requires the Applicant to implement invasive species control measures to comply with invasive species legal requirements as set out in Appendix E: Outline Invasive Species Management Plan included within the First Iteration Environmental Management Plan [APP-132]. As set out in Section N.6 of Appendix N: Outline Landscape and Ecology Management Plan [APP-141] of the First Iteration Environmental Management Plan [APP-127, the Applicant will undertake short term maintenance (0-5 years) and long-term maintenance and management (over 5 years) of newly created habitats and include management of invasive and undesirable species (Paragraphs N.6.14, N6.29,

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		N.6.38). The Outline Landscape and Ecology Management Plan [APP-141] will be developed into the Landscape and Ecology Management Plan as part of the Second Iteration Environmental Management Plan for implementation during construction, and developed into the Third Iteration Environmental Management Plan to secure the long term commitments to aftercare. These actions will be secured by Requirement 4 of the draft Development Consent Order [PD1-005]. As stated in Paragraph N.6.44 of Appendix N: Outline Landscape and Ecology Management Plan [APP-141], monitoring for invasive species will be covered under the specific habitat monitoring of created habitats which will be detailed within the Third Iteration Environmental Management Plan. The Statement of Reasons [APP-018] including Annex A to it sets out why the land is needed for construction and operation of the Scheme with reference to the Works Plans [AS-006], Land Plans [AS-005] and Schedule 1 of the draft Development Consent Order [PD-005].
RR-032d	*Conditions should be added to the planning permission to ensure that Egypt Lane and Simon Lane are not used for any type of vehicular traffic during the construction phase, except emergency access only. The roads are privately owned single lane tracks and are wholly unsuitable for construction traffic. The roads are used on a daily basis by residents and access is required at all times. The tracks will be severely damaged by even light construction traffic and there is currently no commitment from National Highways to repair any damages or restore the road to the original condition. If the permanent right of access over Egypt Lane is granted to National Highways for maintenance access, then National Highways should become a responsible party, including a commitment for National Highways to contribute to the ongoing maintenance of the road.*	The Applicant confirms the Scheme will install temporary accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use Egypt Lane and Simister Lane. There will be the requirement to access from the Egypt Lane and Simister Lane for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology, and the installation of boundary fencing. After the work area has been established then the temporary accesses and egresses into the offline work areas will be utilised. The cable percussion drilling rig is the largest of the equipment and has a transit length of approximately 3.6m and weight of approximately 2400kg. It is noted that both Egypt Lane provides access to the work area over a single lane bridge that has a has a 32-ton weight limit and signs indicating a maximum capacity of one vehicle. The 32-ton weight limit will not be exceeded during any of the pre-commencement works. No heavy-duty vehicles will use Simister Lane/Egypt Lane. This is reserved for light duty vehicles only during early enabling works phase. These works are already secured through the draft Development Consent Order [PD-005]. The Applicant therefore disagrees that additional conditions are required. The Applicant confirms that, once the Scheme is open, Egypt Lane will be required for maintenance access to the new drainage pond, drainage outfalls, earthworks of the M60 eastbound to M60 southbound link and the northern abutment of Pike Fold Bridge. In relation to the maintenance of the access, the Principal Contractor will develop the Second Iteration Environmental Management Plan into a Third Iteration Environmental Management Plan for the operational and maintenance phase of the Scheme, which will be subject to the approval of the Secretary of State for Transport, in consultation with the relevant planning authority pursuant to Requirement 4 of the draft Development Consent Order [PD-005]. The indicative contents of a Third Iteration Environmental Management Plan are set out in DMRB LA 120 (Standards for Highways, 2020). The Third Iteration Environmental Management Plan will be implemented by the maintenance authority responsible for the maintenance of the Scheme during the operational phase.
RR-033 - Bridget Holland		
RR-033a	*I object to the proposed scheme at Simister Island Interchange. The scheme does not take into account in its modelling the fact that some 500Metres away from this site planning inspectors on Places for Everyone have already granted a 1.2square metre industrial space. This will make our area unbreathable, that greenbelt is currently the only thing allowing us to breath in Simister. Further I travel on the motorways a lot and the issue is not simister island it is at M60 Worsley were the bottlenecks appear. Further more and more people are now working from home since this was planned, so why is it required? It is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas*	Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results

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	(AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. St Margaret's C of E Primary School is only 200m from the M62, while Parrenthorn High School is only 300m away (and a similar distance from the M60) so both will be negatively impacted by this scheme. National Highways have only ever proposed or examined variations of a road building proposal, never non-roadbuilding alternatives to reduce demand or its impact.	of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator maintainer of the strategic road network.
RR-033b	*Construction will take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents. Night time motorway closures will transfer traffic onto the local road network, increasing noise and disturbance for local residents. There will be an increase in noise at Kenilworth Avenue, Warwick Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane.*	The Applicant has carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60, significant adverse construction noise effects are predicted during both day and night-time working during online works when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilisation and online works when these works are within around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close, significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane, significant adverse construction noise effects are predicted during both day and night-time working during mobilisation, and during the night-time period during online and offline works. For residential receptors on parts of Parrenthorn Road, adverse significant construction noise effects are predicted during the night-time during mobilisation and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. In terms of compensation for the impact that construction works can have on properties or individuals, the Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called '*Your property and compensation or mitigation for the effects of our road proposals'* sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in *'Your property and our road proposals'*. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme.

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		Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments, which includes measures to reduce noise from construction activities including a commitment to minimize the total number of full carriageway closures that will require the use of traffic diversion routes. Measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team would be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The Applicant has developed the construction methodology in relation to the preliminary design of the Scheme and the space available on the existing road network. The construction programme has been developed to be the shortest duration taking account of the construction methodology and the need to retain the existing number of open traffic lanes at peak times on the M60 / M66 / M62, to minimise the impact on all users of the motorways and local roads. Maintaining the existing number of lanes on the network will mean there is little available working space during the daytime, which means we will need to introduce night-time closures on the M60 / M66 / M62. The traffic management strategy, which gives an overview of the phases and the required network closures during construction, can be found in the Outline Traffic Management Plan [APP-150]. Detailed in the Outline Traffic Management Plan [APP-150] are the diversion routes that will be utilised during night closures of the M60 / M66 / M62. The Scheme will install temporary accesses and egresses into the offline work areas off the strategic road network. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use the local road network (other than in the early enabling works phase where access would be required from the local road network for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology and the installation of boundary fencing). This will minimise impact to the local road network. The design development and construction methodology will continue to be refined with the aim of reducing the number of full closures and use of diversion routes. The Outline Traffic Management Plan [APP-150] will be developed into the Traffic Management Plan for implementation during construction and is secured by Requirement 9 of the draft Development Consent Order [PD1-005].
RR-034 - Louise Holland		
RR-034	*I am no longer sure it is required due to the fact that monitoring has shown a dramatic change to simister island since 2016, as per a recent FOI I received. If there is no longer a traffic congestion issue as many are now working from home, why destroy greenbelt and nature , and millions of pounds of tax payers funds on something that is now in 2024 no longer needed?*	The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at

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		the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. A recent review of traffic data has been undertaken using National Highways Traffic Information System WebTRIS data. The analysis concluded that the traffic volumes have recovered and are higher than pre COVID levels. The Transport Assessment [APP-149] sets out how we developed our traffic models to reflect the baseline traffic conditions as they were in 2018 and then how the 2018 model was used to forecast future conditions. The 2018 baseline traffic model was developed using various different data sources which includes traffic data (some of which was extracted from WebTRIS which provides traffic flow and journey time data accessible through the National Highways website), anonymous mobile phone data to understand travel patterns, digital maps, and Department for Transport guidance. Using the 2018 baseline data, future forecast scenarios were developed as discussed in the Transport Assessment [APP-149]. The Transport Assessment [APP-149] includes details of model scenarios, modelled future years, local developments and how we predicted the future growth. The future year traffic growth was taken from Department for Transport's National Trip End Model Forecasts and the government's projection of future traffic, the National Road Traffic Projections (2022). Increases in traffic due to specific local developments as well as background growth have been accounted for in the modelling in line with the Department for Transport's traffic growth predictions. In line with Department for Transport's, Transport Analysis Guidance, modelling work has been undertaken to understand how the Scheme is likely to perform in forecast scenarios. Three future year traffic models were developed which were also used to support the economic and environmental assessments. The traffic models were developed for 2029 (Scheme opening year), 2044 (Scheme design year, 15 years after Scheme opening) and 2061 (the final year for which Department for Transport has published traffic growth forecast). The traffic models were developed using the Department for Transport's National Trip End Model, which considers national projections in population, employment, housing, car ownership and trip rates. The National Trip End Model forecasts increases in traffic within Greater Manchester and the traffic model forecasts how this will contribute to increases in delay/congestion in the vicinity of M60 junction 18. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future.
RR-035 - CHELSEA BUTTERWORTH JOYCE		
RR-035a	*Main Issues & Impacts I have had difficulty getting in touch - tried to call the number stated on the letter to discuss, however the person I spoke to had no knowledge on the scheme and couldn't help me in the slightest. This is incredibly frustrating, especially since the initial letter indicates for us to call the number if we have any questions. Letter has also gone to elderly neighbours who do not have access to a computer so it is difficult for people to get in touch I expressed concerns regarding the value of our property during & after the works & compensation for this & was advised that the property would have to be on the market prior. I was also advised that the scheme would have to be complete for a year for us to make a claim - both points are unfair as it leaves us in an impossible position having only bought the house in December 2021 & unable to place the market on the house this soon, and could have a detrimental effect on the sale of the house in the near future (next 5 years) which was my original plan. I am deeply concerned about the*	The Applicant apologises for any inconvenience and frustration caused when trying to contact National Highways about the Scheme. The Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklets called '*Your property and compensation or mitigation for the effects of our road proposals'* sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in 'Your property and our road proposals'. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme.

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Reference	**Comment**	**Applicant's Response**
	value of the house during & after the works Changing in the land usage covers both front & side/back entrance to my property surrounding on 3 sides	
RR-035b	*The scheme will mean the carriageway & footpaths giving direct access to both entrances will be compromised. "After" supplementary consultation land usage shows boundary extending to Marston close. We have an En Bloc garage situated on Bosworth close, the only route to which is via the road (Marston Close) included in the new boundary. We require constant access to garden on foot, and with bins, lawn mower etc – new boundary covers carriageway & footways. We require constant access to front of house – new boundary covers carriageway & footways.*	The Applicant confirms access to properties on Mode Hill Lane and Marston Close will be unaffected, other than for a short duration to install utility connections to the main compound. The Applicant confirms that Marston Close has been included within the Scheme's Order Limits (also known as the red line boundary) as the Applicant needs to connect the main compound required to construct the Scheme to existing utilities. To complete the utility connections, the Applicant will need to install temporary traffic management. The utilities companies have indicated that this will likely only require 2-way traffic lights for a short duration, however the scope of works is subject to change upon further discussions with the utilities companies. Once the scope of work is fully understood in this area, consultation will be undertaken with affected residents. During the construction period, a detailed schedule and plan of work will be communicated with residents well in advance of works taking place, including working hours, durations, expected disruption and access implications. With regards to Marston Close, access will be required during the day for a short period of time. This will be planned to ensure minimum disruption on local residents and users of Marston Close. Accesses to properties neighbouring the Scheme, including the En Block garage situated on Bosworth Close, will be maintained throughout the construction and operation of the Scheme. During the operation of the main construction compound, access for all large construction vehicles will be via the strategic road network and the local road network would only be used occasionally for small work vans or in an emergency situation.
RR-035c	*I work from home Mon-Fri & my partner is a night shift worker & sleeps during the day. Increased traffic, both cars and people, will cause serious disruption & increased noise pollution. Noise from the construction will cause a significant increase in noise pollution, this is not advantageous since we have a newborn child I have a rescue dog who is reactive to passers-by – again, increased traffic will aggravate and lead to barking causing noise & potential complaints from neighbours.*	The Applicant has carried out an assessment of likely construction noise and vibration effects, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise in the area of Mode Hill Lane during mobilisation and online works, which include both daytime and night-time working. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts including construction noise and how this will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments , that includes measures to reduce noise from construction activities. The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The Applicant will appoint the community relations team who will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Commitments to implementing a community feedback monitoring strategy and the tools required for this are detailed in commitments PHH18 to PHH21 in the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127]. The First Iteration Environmental Management Plan [APP-127] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and is secured by Requirement 4 of the draft Development Consent Order [PD1-005].
RR-035d	*We always have 2-3 cars at the property which are currently parked on the road. The carriage way is narrow which will lead to congestion getting to site & possible damage to vehicles. The road is in a very poor*	The Applicant will install temporary accesses and egresses into the offline work areas off the strategic road network as part of the Scheme. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use the local road network (other than in the early enabling works phase where access would be required

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	condition with pot holes etc - increased traffic will cause this to worsen I do not want to suffer "rush hour" traffic outside my home whilst staff start and finish work	from the local road network for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology and the installation of boundary fencing). This will minimise impact and disruption to the local road network.
RR-035e	*The property Is our family home, purchased in 2021, main benefit being it was at the end of a road and is very quiet. The scheme will have serious detrimental effects on our quality of life due to increased traffic, noise and the site being an eyesore. Our En Bloc garage is located on Bosworth close, with the only route via Marston Close – we need constant access to the garage, the scheme will mean possible works will take place & mean we may not be able to access both on food & in the vehicle. Ways to reduce impacts Provide alternative off-road parking for residents including dropping curb & surfacing double drive our cars come up with alternative route so Mode Hill Lane is not used for access*	The Applicant acknowledges that the operation of a temporary site compound during the construction phase will increase traffic on Mode Hill Lane. As noted above, the Applicant will appoint a community relations team who will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The Applicant can confirm that access to garages on Bosworth Close will be maintained at all times and therefore there should be no need for alternative off road parking.
RR-035f	*New windows to help with noise- i don't believe the planned trees will be sufficient for major road works. Compensation for loss of value on the house during the works, it is likely that we will be unable to sell the house during this period due to the disruptions in the area and physical factors noted in supplementary consultation letter. Compensation for the loss of value of the house after the work has been completed, it is likely that there will be increased noise from the new carriage way, it will also be unsightly & visible from the property. Compensation for the negative effect on the quality of life whilst the works are going on.*	With regards to construction impacts and mitigation of said impacts, please see the Applicant's response to RR-035c above. The Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called 'Your property and compensation or mitigation for the effects of our road proposals' sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in 'Your property and our road proposals'. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme.
RR-036 - Diane Maguire		
RR-036	*I agree with making the hard shoulder between junction 17 and 18 in a permanent lane but I feel as you've removed all the surrounding trees the noise level has increased and junction 17 now floods which it never did when the trees were on the embankment. I do agree with improving the motorways but at what cost? The trees block the sound, soak up the excess rain water, it's had a massive impact on the area. Put the trees back on all the junctions they have been removed from.*	Figure 2.3, the Environmental Masterplan, of the Environmental Statement Figures [APP-057] shows the landscaping proposals for the Scheme. Planting proposals between J17 and J18 of the M60 includes woodland planting to reinstate and strengthen screening of retained tree belt edges, retention or replacement of environmental barriers along the highway verge which would provide similar levels of screening of the motorway corridor, and mixed broadleaf woodland to reduce visual disturbance and integrate the motorway embankments within surrounding tree belt vegetation. Furthermore, commitment LV13 in the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127] states that 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. By the design year (year 15 of operation) vegetation would establish to provide a similar level of filtering or screening of carriageway lighting and vehicle headlights as provided before the Scheme. The Applicant confirms the use of shrubs or trees as a noise barrier has been shown to be effective only if the foliage is at least 10m deep, dense and consistent for the full height of the vegetation. However, the Applicant acknowledges that a persons' subjective response to a sound source can change when the sound source becomes visible, even when the acoustic influence of vegetation is minimal. Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The

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Reference	**Comment**	**Applicant's Response**
		assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. The Scheme includes a drainage design which has taken into account flooding risk, full details of the drainage strategy can be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The drainage design has been developed in line with the requirements of CG501 - 'Design of highways drainage systems 'which forms part of National Highways' DMRB. As part of the drainage strategy, attenuation ponds are provided on a number of drainage networks. These are sized to accommodate a 1 in 100-year flow event along with a 30% increase in flow due to climate change. Attenuation will also be provided within the Scheme through the provision of oversized pipes which will increase the storage capacity of the system following heavy rainfall events. Specifically, the drainage along the M60 corridor between J17 and J18 will be modified to ensure the network itself can tolerate the flow events referenced above, mitigating the risk of flooding onto private properties.
RR-037 - Tracey Martin		
RR-037a	*The environmental impact to the proposed M60 /66 motorway will be nothing short of disastrous. Has there been an impact report carried out on the area? Has there been any monitoring of pollutants? The past usage of Passive diffusion testing miles away from Simister circle can not be used as a measurement for the monitoring of pollution as it is firstly known for massive inaccuracies and secondary the monitoring needs to be done on the Simister circle NOT at its current position*	The Applicant has undertaken an environmental impact assessment (EIA) which is set out in the Environmental Statement and its accompanying Figures and Appendices [APP-040 to APP-126] which accompanies the application for development consent. The Environmental Statement sets out how the Applicant has considered the environmental impacts as a result of the Scheme and the measures identified to avoid or reduce environmental effects where practicable. The Applicant has designed the Scheme to avoid or reduce impacts to environmental receptors, as documented within Chapter 3: Assessment of Alternatives of the Environmental Statement [APP-042] and technical Chapters 5 to 15 of the Environmental Statement [APP-044 to APP-054]. The Scheme will also provide environmental enhancements, for example habitat creation which will provide an increase in habitats as evidenced by Appendix 8.12: Biodiversity Net Gain (BNG) Report of the Environmental Statement Appendices [APP-102]. The First Iteration Environmental Management Plan) [APP-127] contains the Register of Environmental Actions and Commitments , which details how the mitigation measures that will be delivered. The First Iteration Environmental Management Plan [APP-127] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 5 Air Quality of the Environmental Statement [APP-044] and Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079] provide details of the methodology used to assess air quality impacts as a result of the Scheme. The methodology followed is in accordance with National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 Air Quality standard. Broadly speaking, traffic modelling of the Scheme in the opening year (2029) is used to model air pollution both with and without the Scheme. As monitoring cannot be undertaken for future years, modelling is used. The resulting predicted concentrations are then compared with the UK air quality objectives and limit values for air quality for nitrogen dioxide (NO_2), particulate matter (PM_{10} and $PM_{2.5}$), which are also discussed and presented in Chapter 5 Air Quality of the Environmental Statement [APP-044]. In addition, a past year is also modelled (in this case 2018) using the same methodology and the results compared to monitored air pollution data for the same year (2018) to confirm that the methodology provides robust predictions. Details of monitoring of NO_2 are provided in Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079]. The Air Quality Objectives and Limit Values used to assess against for particulate matter, as an annual mean, are 40µg/m^3 for PM_{10} and 20µg/m^3 for $PM_{2.5}$, neither of these levels are exceeded in the construction year or operational year assessments. As discussed in Chapter 5: Air Quality of the Environmental Statement [APP-044], overall, for human health for annual mean NO_2 and particulate matter, no

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Reference	**Comment**	**Applicant's Response**
		significant effects from road traffic changes during construction and operation of the Scheme are predicted and therefore no further monitoring of the Scheme during operation is planned.
RR-037b	*As a local resident I can understand the need to improve the flow of traffic but what is proposed will not elevate the congestion at the M60/62Liverpool which is in greater need for improvement Iam disappointed and disgusted at the proposed scheme and truly believe this is not the best way to spend tax payers monies*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042] Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. Improvements to other areas of the M60, such as those mentioned in the Relevant Representation, are not within the scope of the Scheme. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149].
RR-038 - WBW Surveyors Ltd on behalf of The Massey Family		
RR-038	*The scheme proposals involve purchasing some of our land for an attenuation pond. The land in question has been allocated for residential development within the approved Places for Everyone development plan of the GMCA. We cannot believe that there is not a more cost-effective location for the scheme designers and the public purse.*	The Applicant can confirm that pond locations, including Pond 2, have been optimised in terms of land take and through a combination of the hydraulic modelling of the drainage design as well as the location of the existing outfalls (watercourses or existing culverts). It is important that the drainage and water from the highway can reach the ponds and outfalls efficiently, without the need for pumping stations which would require increased permanent land take, additional construction costs and long term maintenance. Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122] provides a summary of the Scheme drainage networks. Following statutory consultation and feedback received from the landowner, the area for permanent acquisition around Pond 2 has been reduced, with the remaining land to the north only being required temporarily to allow construction of the pond, modification of carrier pipes, any required modification of outfall pipework to Castle Brook, soil storage and temporary welfare cabins. The design change of Pond 2 was also facilitated through an additional drainage survey undertaken in mid-2023 which confirmed that an assumed supplementary outfall from the M66 was not actually catering for surface water from the M66. This enabled Pond 2 to be moved further into the south west corner of the field thereby reducing the impact on the landowner. Further details about the design change can be found in Chapter 5 of the Consultation Report [APP-021].
RR-039 - Jennifer Joyce Onslow on behalf of Residents of No. [REDACTED] (Residents of No. [REDACTED]		

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
RR-039a	*During Construction and also once the work is complete Noise: - It will affect our sleep, the noise, lights and thudding noises are bad enough already when they're repairing the motorway. Once complete we still have to live with the extra volume and don't want to sleep with all the windows closed during heatwaves! It's never truly dark at night when it should be and the lights will be getting nearer.. Traffic noise will also impact on the daytime use of our home and garden which we use daily.*	The Applicant has carried out an assessment of likely construction noise and vibration effects, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise in the area of Parrenthorn Road during the night during mobilisation and online construction works. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments , that includes measures to reduce noise from construction activities. The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of road traffic noise changes in the area of Parrenthorn Road indicate a reduction in road traffic noise of between 1-3 dB on Scheme opening, which although an improvement on the current situation is unlikely to be noticeable. The Applicant has identified that due to the junction layout and the short distances between junctions on the M60, all sections of the Scheme will need to either remain lit or will be provided with new lighting in accordance with design standards, specified to mitigate, as far as practicable, light spill from the carriageway. This will include installation of "hoods" on the lights where necessary, which will be reviewed as part of the pre-construction design of the Scheme. The visual effects from street lighting and from car headlights is included as part of the visual impact assessment in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046]. Figure 2.3, the Environmental Masterplan, of the Environmental Statement Figures [APP-057] shows the vegetation which would be reinstated along most sections of the highway boundary. By the design year (year 15 of operation) vegetation would establish to provide a similar level of filtering or screening of carriageway lighting and vehicle headlights as provided before the Scheme. The Applicant confirms that temporary lighting will be required during night working to provide clear visibility and ensure safety of the workforce and road users. Construction lighting will be minimised to the work footprint and strategic access/egress routes to avoid unnecessary temporary lighting when no works are taking place. When night working activities require temporary lighting, mitigation measures will be adopted where practicable, including temporary screening, strategic positioning of lighting units, and adopting the best choice of lighting options dependent upon the task, constraints, and external factors. A commitment to implement lighting measures during construction and maintain a suitable lighting strategy that minimises the impact on sensitive receptors is detailed at G6 and G7 within the Register of Environmental

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		Actions and Commitments in the First Iteration Environmental Management Plan [APP-127].
RR-039b	*DIRT: - We've been through this before and construction work like this throws up dirt/dust and it settles on and INSIDE our property which requires constant cleaning. Laundry dried outside is greyer. We'll be breathing it in.*	The Applicant confirms dust from construction is discussed in Section 5.8 of Chapter 5: Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' and therefore mitigation measures have been set out in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127] which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005].
RR-039c	*POTHOLES: In Parrenthorn road the potholes are already deep, will our road surface be further destroyed by the heavy plant vehicles accessing the Motorway Hawkeswater Underpass?*	The Applicant will install temporary accesses and egresses into the offline work areas off the strategic road network as part of the Scheme. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use the local road network (other than in the early enabling works phase where access would be required from the local road network for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology and the installation of boundary fencing). This will minimise the impact and disruption to the local road network. The Applicant will liaise with the local highway authority (Bury Metropolitan Borough Council) throughout the construction phase. Should highway defects be identified that have occurred as a result of the Scheme, we will carry out any necessary repairs to the reasonable satisfaction of the local highway authority.
RR-039d	*Vibration: We have concerns about the construction vibrations, as the M60 gets ever closer and the effects it will be having on the foundations of our property.*	The Applicant has carried out an assessment of likely construction vibration effects, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. Vibration from construction activities is considered for a study area of 100m from activities likely to generate vibration such as piling or compaction. The area of Parrenthorn Road is outside of this study area, indicating that vibration from construction will be below threshold levels for both potential building damage and for human response to vibration. Vibration from road traffic has previously been scoped out in accordance with National Highways' DMRB LA 111 Noise and Vibration standard, as detailed in the Environmental Scoping Report [APP-143],as a maintained road surface will be free of irregularities following construction, and under general maintenance. Vibration during the Scheme's operation will therefore not have a significant effect on surrounding properties.
RR-039e	*Drainage: The field behind our property often floods. We're concerned that, with all the extra road surfaces being laid, all the excess rainwater will need somewhere to go. Will there be adequate provision for drainage, so the water doesn't affect our water table? It looks very different seen in summer to the swamp it becomes in winter.*	The Applicant confirms the Scheme design includes a drainage design which has taken into account flooding risk. Full details of the drainage strategy can be found in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. The drainage design has been developed in line with the requirements of CG501 - 'Design of highways drainage systems' which forms part of National Highways' DMRB. As part of the drainage strategy, attenuation ponds are provided on a number of drainage networks. These are sized to accommodate a 1 in 100-year flow event along with a 30% increase in flow due to climate change. Attenuation will also be provided within the Scheme through the provision of oversized pipes which will increase the storage capacity of the system following heavy rainfall events. This will minimise flooding on the network during the operation of the Scheme.
RR-039f	*Pollution: Increasing traffic is going to cause more air pollution and it's getting closer to us. We are at home 24/7 so are breathing it in all the time. The value of our home will obviously be detrimentally affected. This is the SECOND time since we bought the house that the Motorway has got closer to our home.*	The Applicant confirms Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the

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		Northern Loop slip road (i.e. some traffic is moved further away). The Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called 'Your property and compensation or mitigation for the effects of our road proposals' sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in 'Your property and our road proposals'. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme.
RR-040 - Robert Palgrave		
RR-040	*I object to the proposed scheme at Simister Island Interchange. Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over 60 years due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so. There are no significant benefits to the scheme, only small time savings. This results in the scheme being low value for money with a Benefit to Cost Ratio of just 1.17. The scheme barely pays its way, with every £1 spent on the scheme, taxpayers only see £1.17 of benefits. With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road. It is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. St Margaret's C of E Primary School is only 200m from the M62, while Parrenthorn High School is only 300m away (and a similar distance from the M60) so both will be negatively impacted by this scheme. National Highways have only ever proposed or examined variations of a road building proposal, never non-roadbuilding alternatives to reduce demand or its impact. Construction will take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents. Night time motorway closures will transfer traffic onto the local road network, increasing noise and disturbance for local residents. There will be an increase in noise at Kenilworth Avenue, Warwick Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane. The scheme would lead to an increase in fatal, serious and slight casualties.*	The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging

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		between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified Benefit to Cost ratio (BCR) of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 sets out up to date statistics for the strategic road network "In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)." Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at the Simister Interchange will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following "This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location." Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network. The Applicant accepts that existing levels of road traffic noise in the area are high, with much of the area being within a

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		Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on scheme opening, which whilst an improvement on the current situation is unlikely to be noticeable. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60 significant adverse construction noise effects are predicted during both day and night-time working during online works when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilization and online works when these works are within around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane significant adverse construction noise effects are predicted during both day and night-time working during mobilization, and during the night-time period during online and offline works. For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilization and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments, that includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The Applicant confirms Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air

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		quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new

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		elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct will longer be in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Applicant has undertaken assessments to ensure that the Scheme design has been developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details are available in the Transport Assessment [APP-149].
RR-041 - Anna Patterson		
RR-041a	*The main issues are the disturbance to everyday life. We live directly next to the motorway & general works already disturb us & our neighbours. So I can't imagine what it will be like once the works start. We have spent a lot of money on our property, extending & refurbishments. As we intend to sell in the near future. So these works could possibly affect the price of our property as well as put off potential buyers.*	The Applicant has carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working, for those receptors closest to the works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] at Appendix B which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains the Register of Environmental Actions and Commitments, that includes measures to reduce noise from construction activities including a commitment to minimise the total number of full carriageway closures that will require the use of traffic diversion routes. Measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work, however during the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant will keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents.

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		The Applicant has a series of booklets which explain and provide information regarding the potential effects of construction and the operation of the Scheme on your property. These booklets are available on the Applicant's website. The booklet called 'Your property and compensation or mitigation for the effects of our road proposals' sets out the types of compensation that may be available to affected property owners. The additional booklets in the series go into more detail about the various provisions outlined in 'Your property and our road proposals'. Where no land is to be acquired, landowners may be able to make a claim for compensation in accordance with Section 10 Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 one year and one day following the opening of the Scheme.
RR-041b	*Another main issue is the wildlife. Animals live along side the motorway, deers, bats, badgers, foxes, newts, to name a few. Will this be taken into consideration when the work begins & possibly disturbs or destroys their habitats? I feel these works will cause a lot of misery for the majority of people living along side the motorway. Which in my opinion no one cares about.*	Chapter 8 Biodiversity of the Environmental Statement [APP-047] provides a full assessment of the effects on wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. The chapter details the embedded and essential mitigation required to offset impacts. These measures are set out within the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 8: Biodiversity of the Environmental Statement [APP-047] concludes that there would be no significant effects (i.e. moderate, large or very large effects) once mitigation has been taken into account, on any biodiversity receptor due to construction and operation of the Scheme. The Applicant notes the comments that the works *'will cause a lot of misery'* and that '*no one cares about [the misery]'* but can confirm that the impacts on people living near the motorway have been taken into account. The human health assessment reported in Chapter 12 Population and Human Health of the Environmental Statement [APP-051] has recognised and taken into account the major impact on quality of life for people living close to the motorway during construction, particularly in relation to construction noise as set out in paragraphs 12.18.50 to 12.18.52 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051], which has informed the assessment of a large negative (significant) effect for the construction stage. Furthermore, the interaction of various construction effects and likely effects on mental wellbeing is assessed and reported in paragraphs 12.18.56 to 12.18.58 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051], which assesses significant negative effects for some communities. Mitigation includes the appointment of a Community Liaison Manager who would have a role in responding to concerns and supporting individuals most affected by the Scheme (Commitment PHH17 in the Register of Environmental Actions and Commitments , contained within the First Iteration Environmental Management Plan [APP-127]. These effects and the mitigation will therefore inform the decision-making process on the Scheme and will be weighed up against the longer-term benefits, for example the reduced exposure to high levels of traffic noise in the long-term as set out in paragraphs 12.18.89 to 12.18.95 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051].
RR-041c	*Another point I'd like to make, is that there has been a broken fence in my street. This has been reported several times to the highways agency & the local housing have also tried to have this problem resolved. The fact that the fence has been like this for 2 years, gives me no confidence that the public are cared about. A simple fence can't be fixed in 2 years after several complaints, I worry about the quality of work that may be carried out.*	The Applicant is sorry to hear that the respondent has not been able to resolve their complaint. Ms Paterson can contact the Applicant at *m60j18simisterislandinterchange@nationalhighways.co.uk* with details of the location of the broken fence and the Applicant will investigate.
RR-042 - David Pedersen		
RR-042	*Instead of expanding the M60 Simister Island scheme, I would prefer if the British government invested in alternatives to road transportation instead, especially electric rail (for both passengers and freight) and walking and cycling lanes and paths.*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced

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		on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network.
RR-043 - Diane Plunkett		
RR-043	*This development will have huge negatives impact on the area, affecting flora and fauna which is already compromised. If the proposed development takes place, the effect will be permanent and will further deplete the availability of countryside in a country which is one of Europe's most nature deprived*	The Applicant confirms Chapter 8 Biodiversity of the Environmental Statement [APP-047] provides a full assessment of the effects on wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. Chapter 8 Biodiversity of the Environmental Statement [APP-047] details the embedded and essential mitigation required to offset impacts. These measures are set out within the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 8 Biodiversity of the Environmental Statement [APP-047] concludes there would be no significant effects (i.e. moderate, large or very large effects) once mitigation has been taken into account, on any biodiversity receptor due to construction and operation of the Scheme. The Applicant acknowledges there would be a temporary loss of habitats during the construction of the Scheme. However, the Applicant proposes to implement a landscaping scheme as shown of Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057] which, based on the preliminary design is predicted to provide a net gain in the value of habitats lost as a result of the Scheme (3.68% for area habitats and 58.50% for hedgerows as detailed in Appendix 8.12 Biodiversity Net Gain Report of the Environmental Statement Appendices [APP-102]. This would ensure no permanent loss of habitat. The Applicant would manage these habitats in the long term as summarised in Appendix N Outline Landscape and Ecology Management Plan [APP-141] within the First Iteration Environmental Management Plan [APP-127]. Implementation of the Environmental Masterplan and Appendix N Outline Landscape and Ecology Management Plan are secured by Requirements 5 and 4 of the draft Development Consent Order [PD1-005] respectively.
RR-044 - lee Richards		
RR-044	*Biodiversity impact....environmental impact (Noise and pollution)*	The Applicant confirms Chapter 8 Biodiversity of the Environmental Statement [APP-047] provides a full assessment of the effects on wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. Chapter 8 Biodiversity of the Environmental Statement [APP-047] details the embedded and essential mitigation required to offset impacts. These measures are set out within the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 8 Biodiversity of the Environmental Statement [APP-047] concludes there would be no significant effects (i.e. moderate, large or very large effects) once mitigation has been taken into account, on any biodiversity receptor due to construction and operation of the Scheme. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality,

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		during construction and operation from road traffic changes. The assessment of significant effects are assessed based on National Highways' Design Manual for Roads and Bridges LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore mitigation measures have been set out in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127], which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005]. Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people.
RR-045 - Lisa Ridley		
RR-045	*I object to the proposed scheme at Simister Island Interchange. It is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents. St Margaret's C of E Primary School is only 200m from the M62, while Parrenthorn High School is only 300m away (and a similar distance from the M60) so both will be negatively impacted by this scheme. National Highways have only ever proposed or examined variations of a road building proposal, never non-roadbuilding alternatives to reduce demand or its impact. Construction will take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents. Night time motorway closures will transfer traffic onto the local road network, increasing noise and disturbance for local residents. There will be an increase in noise at Kenilworth Avenue, Warwick Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane. The scheme would lead to an increase in fatal, serious and slight casualties. With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road. There are no significant benefits*	The Applicant accepts that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening, which although an improvement on the current situation is unlikely to be noticeable. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60 significant adverse construction noise effects are predicted during both day and night-time working during online works when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilization and online works when these works are within around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane significant adverse construction noise effects are predicted during both day and night-time working during mobilisation, and during the night-time period during online and offline works. For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilization and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be

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	to the scheme, only small time savings. This results in the scheme being low value for money with a Benefit to Cost Ratio of just 1.17. The scheme barely pays its way, with every £1 spent on the scheme, taxpayers only see £1.17 of benefits. This situation could easily change with any cost overruns. 68 hectares of land surrounding Junction 18 is in the Green Belt. Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over 60 years due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so.	kept to a minimum. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments , that includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' (DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the

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		realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified BCR of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with the NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 which sets out up to date statistics for the strategic

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		road network "*In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)*." Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at Simister will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following "*This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location*" Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west,
RR-046 - Anne Robinson		
RR-046a	*When I put in my response it destroyed the format of two tables making them difficult to read. I have therefore sent my registration comments via email to PINS.*	Noted.
RR-046b	*M60 Junction 18/M62/M66 Simister Island Interchange* *I object to the proposed scheme on the following grounds.* *1. Failure to consider sustainable alternatives – The need for the scheme is described as irresistible as it is committed in RIS2 and in a number of National Highways (NH) documents. These are wholly inadequate reasons. Alternatives have not been assessed as per webTAG. Although 148 improvement options from different combinations of 30 highway elements were considered, there has been no consideration of how to reduce traffic, congestion, and air and noise pollution through demand management of road capacity and modal shift of both people and freight. This is essential in view of both the climate and nature crisis and the unacceptable impacts of existing road traffic and the failure of the scheme to address these issues.* *I am extremely concerned that this proposal may only be start of development – PINS Feb 2021 Advice note states: The Applicant provided an overview of the wider development aspirations held for the locality as noted in some plans and programmes which, if they came to fruition, could require further interventions to the strategic road network and consideration as part of the Applicant's cumulative impact*	The Applicant believes that the Relevant Representation's reference to *'PINS Feb 2021 Advice note'* is referring to the meeting minutes of the Scheme inception meeting held on 12 February 2021 between the Applicant and the Planning Inspectorate under Section 51 of the Planning Act 2008. This meeting was held at an early stage of pre-application prior to the environmental assessment on cumulative effects being undertaken. Chapter 15: Assessment of Cumulative Effects of the Environmental Statement [APP-054] sets out the approach undertaken for the cumulative effects assessment and follows the guidance outlined in the Planning Inspectorate's Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects (Planning Inspectorate, 2019) and the environmental assessment requirements and advice outlined in National Highways' DMRB LA 104: Environmental Assessment and Monitoring (Highways England, 2020). Chapter 15: Assessment of Cumulative Effects of the Environmental Statement [APP-054] provides information on how the effects of the Scheme would combine and interact with the effects of other developments, where relevant (this is known as inter-project cumulative effects). The inter-project cumulative effects assessment identifies other existing and committed developments, comprising Nationally Significant Infrastructure Projects (NSIPs), major developments, and site allocations within a defined Zone of Influence (ZOI), which is a defined geographic area within which potential environmental receptors are located, and provides an assessment of the potential cumulative effects in combination with the Scheme. Site allocations identified in local development plans were identified in the long list of other developments (Table 2.1 in Appendix 15.1: Inter-project Cumulative Effects of the Environmental Statement Appendices [APP-125], but were not progressed to the next stage of assessment (shortlisting), on the basis that the amount of information available and the resulting certainty around the assessment of cumulative effects is limited. It is expected that future developers bringing forward projects in line with the allocations would carry out their own assessments of cumulative effects. Where planning applications have been brought forward on sites allocated in relevant local development plans this is identified in the 'Progress to Stage 2' column

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	assessment. There does not seem to be any mention of this in ES Ch 15 cumulative impacts. *NH concludes there would be no significant impacts from the scheme at design yr-15, largely because they are not addressing the current severe impacts of the 90,000 vehicles per day at this junction on people and the environment.*	of the longlist of the developments in Table 2.1 in Appendix 15.1: Inter-project Cumulative Effects of the Environmental Statement Appendices [APP-125], and the relevant planning applications have been considered as appropriate in the inter-project combined effects assessment. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. There are no identified significant impacts from the Scheme in the design year. Principally, this is the result of the Scheme having conducted an environmental impact assessment, appraised the baseline for the current situation and tested scenarios and models with the Scheme having been delivered as per the design outlined in the application for development consent. Environmental Impact Assessment is a process that considers how a proposed development will change the existing (baseline) conditions and what the consequences of such changes will be. It does not involve assessing the impacts of the existing conditions in addition to the proposed changes from a baseline of zero.
RR-046c	*2. Traffic growth – The PEIR anticipated increases of traffic (compared to baseline 2018 traffic) of 40% on the M60 and M62, and 27% on the M66 with the scheme in 2044. Which is simple and straightforward. There is nothing simple or straightforward about the presentation of traffic data in either the Case for the Scheme or the Transport Assessment. The modelling and appraisal data is missing and should be supplied.* *Modelling is based on DfT's 2018 traffic forecasts [4.3; Transport Assessment 2.2]. The overall level of growth in car trips from those observed in 2018 [Transport Assessment Figure 4.2] to the three future year scenarios – 2029, 2044, 2061 - is taken from the most recent DfT National Trip End Model (NTEM) forecasts, published in August 2022. NH have taken the Core Scenario [Transport Assessment 2.6.13] which projects a 22% increase in traffic between 2025 and 2060. For the SRN, traffic flows are given in time periods within the day (AM, IP and PM) which conceals the fact that the traffic at this interchange is in the region of 90,000 vehicle movements a day. The change in AADT (ie the difference between Do Minimum and Do Something) for the SRN is given for 2029 opening year in Transport Assessment Figures which cover AM PM and Inter-Peak periods.*	The Applicant confirms the Transport Assessment [APP-149] provides an overview of the base and forecast model development alongside a summary of network performance with and without the Scheme in each of the modelled time periods. Average Annual Daily Traffic (AADT) flows are then just an expanded and combined version of these time period flows. With regards to the traffic growth levels discussed, growth on specific links in the Scheme's modelling assessment is not directly comparable with growth from DfT's traffic projections. Traffic growth in the models is constrained to the levels forecast by DfT's National Trip End Model (NTEM) at the regional level. However, forecast growth on specific links in the model is then a function of a variety of modelled effects including: the assigned routes taken by traffic; the specific mix of vehicle types on the link in question; the impact of nearby development sites; the impact of nearby transport schemes; and variable demand effects (induced / suppressed traffic). Of particular relevance to growth on the links analysed here is the M60 J8 – M62 J20 Smart Motorway scheme which was in construction during the 2018 base year (with the roadworks constraining traffic flows in the area) but then is modelled as being operational by the first 2029 forecast year (with additional capacity provided on M62 J18-20 resulting in some increases in traffic flows in the area). The Applicant acknowledges the concerns regarding Figure 4-4 and 4-8 within the Transport Assessment [APP-149], however they are not designed to confuse the general public, the colour coding is there to highlight where AADTs are expected to increase and decrease, with the numbers being included to enable members of the public to check the scale of change at the specific locations of interest to them.

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	It is quite difficult to see a trend through the complex presentation – some flows go up, others go down and some stay the same. National Highways states that for the SRN, the highest traffic flows in the area are observed along the M60 between Junction 17 and Junction 18 in both directions, especially in the PM peak. I have therefore taken the east bound flows for this section from the figures above; they are presented in the table below.	

Eastbound Vehicle Flows M60 between Junction 17 and Junction 18						
Period	**2018 obs**	**2029 DM**	**% ↑ obs v DM**	**2029 DS**	**2044 DM**	**2044 DS**
AM	5876	6888	17%	7319	7185	7637
IP	5024	6239	24%	6634	6656	7070
PM	6350	7587	19%	8154	7652	8468

	From this it can be seen that traffic growth without any scheme is between 17-24% over 11 yrs which seems high, considering that (1) the DfT core scenario projects a 22% growth over 35 years and (2) congestion is a significant problem at this junction and should inhibit growth. Traffic growth without any scheme over a 15-year period between the 2029 DM and the 2044 DM is much lower than that between 2018 and 2029 - 4% in the AM, 7% in the IP and 0.8% in the PM. NH is claiming severe congestion at a junction which if nothing was done would see far more growth than that forecast by the DfT core scenario of 17%-24% over an 11-year period and then little growth over the following 15-year period. This requires an explanation. Artificially raising the baseline growth (between 2018 and 2029) reduces the difference between DM-DS scenarios on which all assessments are made. The difference between, for example, the 2029 DM-DS PM vehicle flows is 7% whereas that between 2018 observed and DS PM vehicle flows is 28%. Growth over a 15 year period between 2029 and 2044 with the scheme in place is 4% in the AM, 7% in the IP and 4% in the PM. However growth between 2018 and 2044 is 30% for the AM, 41% for the IP and 33% for the PM. Such differences are hugely significant when assessing environmental and societal impacts. *The change in AADT for the whole day for each local road is presented on a small diagram [Transport Assessment Fig 4-4 for 2029; Fig 4-8 for 2044] with literally hundreds of AADTs overall, leading to a melee of numbers designed to confuse, obfuscate and deter people from understanding how traffic changes in the area on local roads.*	
RR-046d	*3. Increased fatal, serious and slight casualties – NH aims to make the road safer for all users. It fails to do this [Transport Assessment Figure 6.2; Table 6-1]. Although the number of collisions reduces by 9, the casualties increase by 65 with a monetised safety disbenefit of -£0.36 million [5.3.7].*	The Applicant confirms 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.

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	<table><tr><td></td><td colspan="4">Casualties over 60 yrs</td></tr><tr><td>Scenario</td><td>Fatal</td><td>Serious</td><td>Slight</td><td>Total</td></tr><tr><td>Without scheme</td><td>110</td><td>1214</td><td>14577</td><td>15851</td></tr><tr><td>With scheme</td><td>111</td><td>1265</td><td>14590</td><td>15866</td></tr></table> *Increased casualties means that the scheme does not meet the requirements of the National Highways Safety Framework for the SRN or the Government's safety policy [NNNPS 4.59]. All reasonable steps have not been taken to improve safety (e.g. speed reduction, traffic management) therefore the scheme is not compliant with NNNPS.*	An assessment of accident impacts has been completed using Cost and Benefits to Accidents Light Touch (COBALT), the assessment forecasted a reduction in accidents as a result of the Scheme. These 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 [APP-149] Table 6-4 of the Transport Assessment [APP-149] indicates that the strategic road network is forecast to experience an increase in accidents as more people are attracted to using the strategic road network as a result of better journey reliability once the Scheme is operational, as much of the additional strategic road network 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 [APP-149] 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. 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. 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 [APP-149]. The Applicant also confirms that 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 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. A variable speed limit will be in place 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. 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 [APP-057]. 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 strategic road network The presentation of this information is designed to ensure that customers navigate this busy section of the strategic road 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.

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		As set out in Chapter 2, The Scheme of the Environmental Statement [APP-041], the Scheme will also upgrade existing intelligent transportation systems or install new systems where required. This includes variable mandatory speed limit (VMS) mounted on cantilever and long span cantilever gantries, Advanced Motorway Indicator (AMI) above lane signals, Highways Agency Digital Enforcement and Compliance System (HADECS) and External Aspect Verification (EAV), Closed Circuit Television (CCTV), and Motorway Incident Detection and Automatic Signalling (MIDAS). The gantries will therefore provide both fixed signage to direct motorists as well as incorporating advanced technology to present dynamic information. This enables the strategic road network 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 strategic road network. The presentation of this information is designed to ensure that customers navigate this busy section of the strategic road 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. It also assists the emergency services respond to any incidents quickly. The area covered by the Scheme already has a notably lower Fatal Weighted Injury rate per billion vehicle miles than the strategic road network motorway average, however it has an overall collision rate higher than the strategic road network motorway average. The reduction in congestion will reduce the number of overall collisions to contribute to an overall improvement in the safety of the strategic road network, however those collision that may occur will be at higher speeds and the severity may therefore be increased. Furthermore, 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 strategic road network motorway average, however it has an overall collision rate higher than the strategic road network motorway average. The reduction in congestion will reduce the number of overall collisions to contribute to an overall improvement in the safety of the strategic road network, however those collision that may occur will be at higher speeds and the severity may therefore be increased. 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 strategic road network is improved by the Scheme when considered proportionally against the total number of miles driven over the 60 year appraisal period. 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 strategic road network.
RR-046e	*4. Air pollution would increase – With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. This is a serious concern of Bury MBC which is the responsible air quality authority [ES Ch 5 Air Quality, Table 5.15 shows exceedances at monitored sites]. The whole of the motorway network here lies within Greater Manchester's Air Quality Management Area, the management of which has been seriously delayed. Two new air quality targets for 2040 – one for annual mean concentrations of PM2.5 and a population exposure reduction target for PM2.5 – have been set under the Environment Act 2021 [NNNPS] and The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.However NH claims that the location of the relevant monitoring stations means these targets do not apply to the scheme. The legal requirements must be met.*	The Applicant confirms Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DDMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits or air quality objectives.

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	The 2018 modelled baseline air quality results show that 261 out of 653 receptors recorded nitrous dioxide (NO2) that exceed the annual limit value 40µg/m3 [Es Ch5 Appendix 5.2]. Without the scheme in 2029 air there would be 7 exceedances of NO2; with the scheme there would be none [Es Ch 5 Table 5.25]. For PM10 the 2018 survey results and the modelled results in 2029 without or with the scheme are all below the current annual limit of 20µg/m3. However overall, 368 of the 557 human health receptors are modelled to experience an increase in annual mean NO2 concentrations as a result of the Scheme [Es Ch 5. 5.10.24] and some receptors experience increases in PM10 giving a disbenefit in cost of - £1.3m. Of particular concern are St Margaret's C of E Primary School, which is only 200m from the M62, and Parrenthorn High School, which is only 300m away (and a similar distance from the M60). Both will be negatively impacted by this scheme. *NNNPS states that air quality considerations are likely to be particularly relevant where schemes are proposed within or adjacent to Air Quality Management Areas; or on roads identified as being above Limit Values [para 5.23], as in this case. Air quality considerations should be given substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to meeting environmental assessment requirements (as here); or where they lead to a deterioration in air quality in a zone/agglomeration [NNNPS 5.24].* *Consent should be refused where, after taking into account mitigation, the air quality impacts resulting from the proposed scheme will either: result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Standards Regulations (2010) becoming non-compliant; or affect the ability of a non-compliant area to achieve compliance within the most recent published timescales reported to the Examining Authority at the examination [NNNPS 5.25]. As the scheme would continue the non- compliance of the GM AQMA it should be refused.*	Results presented in Table 5.15 in Chapter 5 Air Quality of the Environmental Statement [APP-044] are for past air quality monitored data in 2018 for those sites that exceed the nitrogen dioxide (NO_2) limit value/air quality objective annual mean of 40µg/m^3. However, as shown in Table 1.5 of Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079], there also a large number of monitoring sites in 2018 that are below the NO_2 limit value/air quality objective. It should also be noted that monitoring is typically carried out at worst-case locations and so shows location that are higher than others. In terms of the $PM_{2.5}$ targets, these are discussed in paragraphs 5.3.3 to 5.3.5 of Chapter 5 Air Quality of the Environmental Statement [APP-044]. The legislation provides that the targets only apply at relevant $PM_{2.5}$ monitoring stations that existed immediately before the targets came into force (early 2023). The nearest $PM_{2.5}$ monitoring stations are the Department for Environmental, Food and Rural Affairs (Defra) managed Salford Eccles and Manchester Piccadilly sites and the local authority managed Salford M60 and Rochdale Queensway sites (located 6.8km, 7.0km, 7.3km and 7.8km from the Scheme area, respectively). None of these sites are affected by this Scheme and therefore the new $PM_{2.5}$ 2040 targets (and the interim targets) do not apply. The air quality results in 2018 are not affected by the Scheme, it is only during construction and after Scheme opening that the Scheme has any impact on air quality and it is these results (i.e. the construction and operation results) that are used in the assessment of significance and in the context of the NPS NN (both versions designated in January 2015 and May 2024) and more generally in terms of the impact of the Scheme. The key consideration here is whether the air quality concentrations in the with-Scheme scenarios are at or above the relevant limit values, or air quality objectives, and where this is the case, by how much and whether it is an increase or decrease from the without-Scheme scenario. As can be seen from the modelled results discussed in Section 5.10 in Chapter 5 Air Quality of the Environmental Statement [APP-044], all results are either below the relevant limit values/air quality objectives for construction and operation for the with-Scheme scenario, or there is a reduction in concentration (i.e. air quality improves with the Scheme in place). The Scheme would therefore not contribute to any non-compliance of the Greater Manchester AQMA or non-compliance of the limit values.
RR-046f	*5. Noise pollution would increase - There are six NIAs within 600m of the Scheme, 4 adjacent to the motorway and 2 adjacent to the local road network and together affecting 1,265 dwellings. Mitigation with quieter road surfacing and insulation may result in more people benefitting from reduction of noise than experience an increase but for 326 receptors noise would worsen for an increase of less than 1dB LA10,18h / Lnight [11.33]. However, noise pollution from construction is particularly severe, causing significant adverse impacts [Es Ch11, 11.12]. Construction would take place at night over a three and half year period, causing unacceptable noise and disturbance to local residents living on streets adjacent to the junction. This is means the DCO fails to meet the Noise Policy for England 2019 which aims to avoid, mitigate and minimise such adverse significant impacts, on*	The Applicant confirms Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The predicted noise level change at NIAs is summarised in Table 11.34 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] which identifies Negligible magnitude of change in road traffic noise within 5 of the NIAs and Major magnitude beneficial decreases in road traffic noise in parts of NIA 1671. Changes in road traffic noise of 3dB or more can be perceptible to people. There are predicted to be negligible magnitude increases in road traffic noise of less than 1 dB for 326 residential dwellings which, given that this is less than a 3dB change would not be noticeable to the residents of these dwellings, and is not considered as a significant effect. The Applicant has carried out an assessment of likely construction noise and vibration effects, as presented in Chapter 11

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	health and quality of life. The scheme is therefore non-compliant with NNNPS 5.239.	Noise and Vibration of the Environmental Statement [APP-050]. The results identify that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential noise and vibration impacts and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments , which includes measures to reduce noise from construction activities. The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. The aims of the Noise Policy Statement for England (NPSE) are to avoid, mitigate and minimise significant adverse impacts within the context of Government policy on sustainable development. Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] demonstrates compliance with the aims of the NPSNN designated in May 2024) and NPSE in paragraph 11.12.4 Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] in terms of operational effects of the Scheme The assessment presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] identifies adverse impacts during construction, and then identifies noise mitigation during construction. The aims have to be considered 'within the context of government policy on sustainable development'. As described with Section 3.65 of National Highways' DMRB LA 111 Noise and such factors include cost, engineering constraints and adverse impact on other environmental topics. There is a need to integrate consideration of the economic and social benefit of the activity under examination with proper consideration of the adverse environmental effects, including the impact of noise on health and quality of life. This should avoid noise being treated in isolation in any particular situation without considering other related factors. Following the statutory consultation in early 2023 concerns were raised by residents from the Trees estate in relation to Pond 6, which was located in Whitefield, north of the M60. The concerns were in relation to construction traffic and disruption during construction, as well as access concerns. Subsequently significant changes were made to the drainage strategy removing the need for the pond in this location, and also removing the potential significant adverse noise effects as a result. This is an example which demonstrates the Applicant's commitment to avoiding adverse impacts where possible, which is compliant with the aims of the NPSE. The provision of the First Iteration Environmental Management Plan [APP-127] and Outline Noise and Vibration Management Plan [APP-129] demonstrates the Applicant's ongoing commitment to mitigate and mimimise the effects of construction noise, which is compliant with the aims of the NPSE. Two sets of NPS NN accordance tables were submitted with the application for development consent which cover the January 2015 designated version of the NPS NN [APP-147] and the draft version of the NPS NN as at March 2023 [APP-

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		148]. The latter was the most recent version of the NPS NN at the time of submission and was subsequently designated in May 2024. Therefore, an additional submission was accepted at the discretion of the Examining Authority [AS-007] which provided a comparative assessment of the designated and draft version and the NPS NN designated in May 2024. The Applicant has accordingly assessed the Scheme against all climate and carbon related aspects of both versions of the NPS NN. The provision of the assessment of construction noise and vibration effects, including discussion of noise mitigation measures, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] is compliant with the NPS NN designated in May 2024) as the assessment identifies the potential construction and operational significant adverse impacts, and outlines measures to avoid, mitigate and minimise these effects. The Applicant has consequently assessed the Scheme against all noise aspects of the NPS NN.
RR-046g	*6. Climate emissions would increase - The total emissions would be 201,784tCO2e (construction carbon 62,013tCO2e [Es Ch.14, Table 14.22]; operational emissions 151,090tCO2e [Es Ch.14 Table 14.23]. Total road user GHG emissions over 4th/5th/6th UK Carbon Budget periods are 6,003,082 tCO2e of which the scheme would contribute 96,820 tCO2e. Scheme contribution to each of these carbon budgets represents 0.0002% therefore NH concludes there would be no significant impact on achieving these budgets [Es Ch14 Table 14.24]. This is a false assertion as increasing GHG emissions will make it even harder for the UK to reach its legally binding climate targets when it is already struggling to do so.* *The TDP sensitivity test is applied with no explanation of its methodology [Es Ch14, 14.10.9 & Table 14.25]. It should be ignored until the methodology is presented.*	Two sets of NPS NN accordance tables have been submitted with the application for development consent which cover the January 2015 designated version of the NPS NN [APP-147] and the draft version of the NPS NN as at March 2023 [APP-148]. The latter was the most recent version of the NPS NN at the time of submission which was subsequently designated in May 2024. Therefore, an additional submission was accepted at the discretion of the Examining Authority [AS-007] which provided a comparative assessment of the designated and draft version and the NPS NN designated in May 2024. The Applicant has accordingly assessed the Scheme against all climate and carbon related aspects of the NPS NN. The transitional arrangements set out in the NPS NN designated in May 2024 confirmed that those applications for development consent accepted for examination prior to the designation of the NPS NN in May 2024 would be examined and decided against the January 2015 designated NPS NN. The application for development consent for this Scheme was accepted for examination in April 2024. However, NPS NN designated in May 2024 may also be an important and relevant consideration by the Secretary of State in making their decision as to whether to consent the application. Paragraphs 5.16-519 of the NPS NN (designated January 2015) relates to Carbon Emissions and for decision making, paragraph 5.18 states: *The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan. Therefore, any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets.* The Applicant confirms the estimated increase in greenhouse gas emissions during the construction phase of the Scheme, paragraph 5.40 of the NPS NN designated May 2024) states that *"… given 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*". In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005].

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		With regard to the estimated increase in road user greenhouse gas emissions as a result of the Scheme, paragraph 5.41 of the NPS NN designated in May 2024 states that "*Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational carbon emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework*". Furthermore, paragraph 5.42 of the NPS NN designated in May 2024 states "*Operational emissions will be addressed in a managed, economywide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero. However, where the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of government to achieve its statutory carbon budgets, the Secretary of State should refuse consent*". In accordance with National Highways' DMRB LA 114 Climate standard, estimated changes in greenhouse gas emissions because of the Scheme have been compared to UK carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. As noted in Chapter 14 Climate of the Environmental Statement [APP-053], sensitivity testing has been undertaken to illustrate the potential impact of the Transport Decarbonisation Plan (TDP) (Department for Transport, 2021) on the magnitude of estimated changes in road user greenhouse gas emissions as a result of the Scheme. These sensitivity tests are based on the 'upper' and 'lower' bounds of the projected rate of improvement in domestic transport greenhouse gas emissions shown in Figure 2 of the TDP (DfT, 2021). Further details on how these 'upper' and 'lower' projections were derived by DfT can be found on the TDP website (https://www.gov.uk/government/publications/transport-decarbonisation-plan). It should be noted, however, that the results of these TDP sensitivity tests were presented in Table 14.25 of Chapter 14 Climate of the Environmental Statement [APP-053] for information purposes only, and that the assessment of significance provided in Chapter 14 Climate of the Environmental Statement [APP-053] was based on the more conservative estimates of road user GHG emissions presented in Table 14.24. These more conservative estimates were produced using speed band emission factors derived from version 11 of Defra's Emission Factors Toolkit (EFT v11), that did not account for the impacts of the TDP, and which is expected to lead to a substantive decrease in GHG emissions from all forms of road transport between now and 2050.
RR-046h	*7. Impact on Green Belt – the majority of the scheme lies within the Green Belt [Figure 6.1]. 'Places for Everyone', Greater Manchester's Spatial Framework has allocated land to the north-east of the junction, JP-G10 Heywood/Pilsworth Strategic Allocation for development [Figure 6.2]; the Northern loop would lie within this allocation. The scheme is inappropriate development which is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances [NNNPS 5.203]. It would, with a new viaduct and a new bridge, impact adversely on the openness of the Green Belt, it is not local transport infrastructure and there are no very special circumstances as the potential harm to the Green Belt by reason of*	Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within

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	inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. For example, the failure to consider alternatives, the increased number of road casualties, air and noise pollution, and climate emissions. It therefore fails the very special circumstances test for development within the Green Belt.	the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The Environmental Statement Chapter 3, Assessment of Alternatives [APP-042], Chapter 5, Air Quality [APP-044], Chapter 11, Noise and Vibration [APP-50] and Chapter 14, Climate [APP-53] and the Case for the Scheme [APP-0146] assess the consideration of alternatives, air and noise pollution, climate emissions and road safety. The very special circumstances referred to above are the Applicant's reasons as to why we consider this test is met. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. The Applicant has undertaken assessments to ensure that the Scheme design has been developed to be as safe as possible. They include the setting of safety objectives, consideration of all safety aspects of the Scheme by a team of road safety experts and reviewing the Scheme design by a team of independent road safety specialists. To set the safety objectives for the Scheme, consideration was given to the underlying change in collision and injury rates on comparable sections of the road network. Two sources of data were considered: collision data for the motorway network as a whole and the Smart Motorway Stocktake, a review of the safety performance of Smart Motorways compared to other motorway types, to investigate if the performance of other sections of Controlled Motorways could be utilised. The collision data for the five-year period between 1 January 2010 to 31 December 2014 inclusive was analysed and compared to the data for the period 1 January 2019 to 31 December 2019. The analysis showed that the 2010 – 2014 period is still sufficiently representative, in

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		terms of types, severity and general location, to be used to set the baseline. It is considered that the Scheme as a whole will improve the safety of the Simister Island Interchange by reducing the number of conflicts on the Simister Island circulatory carriageway, reducing congestion on the M60 and reducing the number of merging manoeuvres on to the main carriageways. Further details are available in the Transport Assessment [APP-149]. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.
RR-046i	*8. No net gain in biodiversity - NH is aiming for no loss but Natural England wants an ambitious net gain in biodiversity. There will be a net gain in habitats of 3.68% and in hedgerows of 58.50% [ES Ch 8 Table 8.30]. There are a number of local nature reserves and sites of biological importance, of which 9 lie within 1km of the DCO boundary and 11 lie within 200m of the affected road network. Impacts during both construction and operation include adverse impacts on bats, otters, birds (including barn owls and bitterns), great crested newt, brown hare, and hedgehog, however none are considered significant.*	The Applicant acknowledges the comments made with respect to biodiversity net gain and impacts to biodiversity receptors. The Environment Act 2021 sets out the mandatory provision of biodiversity net gain which should be at least a 10% gain in habitats of that lost to a scheme. This is expected to be mandatory for all Nationally Significant Infrastructure Projects by November 2025, but there is currently no legal requirement for the Scheme to provide biodiversity net gain. Nonetheless, the Applicant has sought to maximise opportunities for the Scheme to deliver biodiversity gain and, based on the preliminary design, is forecasting an overall net gain in the value of habitats lost as a result of the Scheme (3.68% for area habitats and 58.50% for hedgerows) as detailed in Appendix 8.12 Biodiversity Net Gain Report of the Environmental Statement Appendices [APP-102]. Chapter 8 Biodiversity of the Environmental Statement [APP-047] provides a full assessment of the effects on designated

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		sites, wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. Chapter 8 Biodiversity of the Environmental Statement [APP-047] details the embedded and essential mitigation required to offset impacts. These measures are set out within the Register of Environmental Actions and Commitments contained within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. Chapter 8 Biodiversity of the Environmental Statement [APP-047] concludes there would be no significant effects (i.e. moderate, large or very large effects) once mitigation has been taken into account, on any biodiversity receptor due to construction and operation of the Scheme.
RR-046j	*9. Adverse landscape and visual impacts – Visual impacts are considered with mitigation to be slightly adverse. I do not agree. Although set within the existing motorway corridor, the widening of the motorway, the new viaduct flying over the existing junction, loss of vegetation, night lighting, headlamps and new signs/gantries would increase the prominence of the new and the existing road leading to substantial adverse impacts.*	The Applicant has undertaken a Landscape and Visual Impact Assessment which is included in the Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and has looked at the impacts of the Northern Loop during the construction and operational phases. The methodology detailing the Landscape and Visual Impact Assessment approach is described in Appendix 7.1: Landscape and Visual Impact Assessment Methodology of the Environmental Statement Appendices [APP-082] which complies with the requirements set out in National Highways' Design Manual for Roads and Bridges LA 104 Environmental Assessment and Monitoring and LA 107 Landscape and Visual Effects. The Landscape and Visual Impact Assessment has considered the impacts of the Northern Loop, including the loss of vegetation and inclusion of new signs and gantries, on landscape character and visual amenity. The assessment has concluded that there will be no significant adverse visual effects once mitigation has sufficiently established. The environmental design has aimed to maximise opportunity for landscape integration and reduce the influence of the Scheme on people's views. The visual assessment has identified that there would be some beneficial effects (improvements on existing views) in some locations around M60 junction 18 as a result of the Scheme. The environmental design shown on Figure 2.3, Environmental Masterplan, of the Environmental Statement Figures [APP-046] shows the location of mitigation planting to offset the visual impacts and also to provide landscape integration of the Northern Loop. The Landscape and Visual Impact Assessment includes a brief assessment of the visual effects from street lighting and from car headlights. Figure 2.3, Environmental Masterplan, of the Environmental Statement [APP-057] shows the vegetation which would be reinstated along most sections of the highway boundary. By the design year (year 15 of operation) vegetation would establish to provide a similar level of filtering or screening of carriageway lighting and vehicle headlights as that provided before the Scheme. The detailed assessment of landscape effects is set out in Appendix 7.3 Schedule of Landscape and Townscape Effects of the Environmental Statement Appendices [APP-084]. The detailed assessment of visual effects is set out in Appendix 7.4 Schedule of Visual Effects of the Environmental Statement Appendices [APP-085]. The Applicant has undertaken an Arboricultural Impact Assessment which is included in Appendix 7.5. Arboricultural Impact Assessment of the Environmental Statement Appendices [APP-086]. The Arboricultural Impact Assessment [APP-086] covers trees and woodland that could be affected by the Scheme and 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 [APP-086] show the locations of trees within the Order Limits, and those currently at risk of removal. The Arboricultural Impact Assessment [APP-086] includes recommendations for tree protection measures during the construction phase, and for the development of an Arboricultural Method Statement to detail how they will protect existing trees within temporary working areas. The Landscape and Visual Impact Assessment which is included in the Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and Figure 2.3, Environmental Masterplan, of the Environmental Statement Figures [APP-046] have referred to the Arboricultural Impact Assessment [APP-086] to inform the overall assessment on landscape and visual.

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		A series of visualisations, included in Figure 7.7, Photomontage of the Environmental Statement Figures [APP-067], have been developed which have modelled the Scheme and mitigation planting at year 1 (2029) and year 15 (2044) to show how the landscape design could look, and includes visualisation for the Northern Loop. 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 [APP-082].
RR-046k	*10. Poor value for money – The initial BCR is 0.86. With wider benefits of £27.84m the BCR increases to only 1.17. Managing demand for road space and investing in modal shift would give much better value for money.* *Anne Robinson* *27 June 2024*	The Applicant confirms an assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. . The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified BCR of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with NPS NN (both the NPS NN designated in January 2015 and the NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 , *"In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)."* Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at Simister will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following *"This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location."* Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network.
RR-047 - Mrs Judith Sheppard		
RR-047	*I strongly object to the proposed scheme at Simister Island Interchange. It is one of the busiest motorway junctions in the north-west, and is already within Noise Important Areas (NIA) and Air Quality Management Areas (AQMA). Rather than increasing capacity, National Highways should be seeking to reduce demand I believe that this is a lazy and expensive solution to traffic congestion. It has serious implications for the health and wellbeing of residents who will be effected by climate/carbon and environmental/ecological harm caused by increased air, dust, noise, light and vibration pollution for communities. You should be exploring solutions to reduce such concerns not exacerbating those issues by increasing capacity. Instead of dealing with the severe air and noise pollution already faced by local people, this scheme would make things worse for many local residents and St Margaret's C of E Primary School is only 200m from the M62, while Parrenthorn High School is only 300m away (and a similar distance from the M60) so both will be negatively impacted by this scheme.* *Given Greater Manchester's adopted spatial plan will release more than 2,400 hectares of Green Belt for development, any additional loss of Green Belt for this scheme is not acceptable. 68 hectares of land surrounding Junction 18 is in the Green Belt If this planned construction will take place over a 3 ½ period during the night, surely you must consider the unacceptable disturbance to local residents who will be impacted by the noise and increase of traffic on local roads which in itself brings additional concerns to residents for safety reasons.* *There will be an increase in noise at Kenilworth Avenue, Warwick*	The Applicant accepts that existing levels of road traffic noise in the area are high, with much of the area being within a Noise Important Area (NIA). Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes for the provision of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Predictions of the change in road traffic noise at St Margaret's C of E Primary School and Parrenthorn High School indicate a reduction in road traffic noise of between 1-2 dB on Scheme opening, which although an improvement on the current situation is unlikely to be noticeable. The Applicant has also carried out an assessment of likely construction noise and vibration effects and the effects of construction traffic noise, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise during the construction phase, which includes both daytime and night-time working. For residential receptors at Kenilworth Avenue, Warwick Avenue and Warwick Close south of the M60; and Balmoral Avenue, Kensington Street, Glendevon, Conisborough Place north of the M60 significant adverse construction noise effects are predicted during both day and night-time working during online works when these works are within around 200m of these receptors. Significant adverse construction noise effects have also been predicted at Duddon Close and Derwent Avenue north of the M60 during mobilisation and online works when these works are within around 200m of these receptors. For some receptors on Peveril Close, significant adverse effects have been predicted during online works during the night-time period. For residential receptors around Brathay Close, Rothay Close and Marston Close significant adverse construction noise effects have been predicted during mobilisation works and online works during day and night-time periods, and during the daytime during offline works. At Corday Lane significant adverse construction noise effects are predicted during both day and night-time working during mobilization, and during the night-time period during online and offline works. For residential receptors on parts of Parrenthorn Road adverse significant construction noise effects are predicted during the night-time during mobilisation and online works. There are no predicted significant adverse effects from night-time traffic diversions during construction as the timetable for full carriageway closures will be kept to a minimum.

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	Close, Warwick Avenue and Peveril Close to the south, Balmoral Avenue, Kensington Street, Glendevon and Conisborough Place, Duddon Close and Derwent Avenue, to the north, and closer to Junction 18 at Brathay Close, Rothay Close, Marston Close and parts of Parrenthorn Road and Corday Lane. *With or without the scheme, air pollution levels will still be unacceptably high and above safe limits and in some places will be made worse. National Highways should be examining solutions that will decrease the unacceptable level of noise and air pollution caused by the existing road.* *Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over a 60 year period due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets.*	Alongside the design, the Applicant is developing a strategy for how the Scheme will be built. This will include details about potential impacts such as noise and vibration and how these will be mitigated. Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [APP-127] and will be incorporated into working practices. The First Iteration Environmental Management Plan [APP-127] includes an Outline Noise and Vibration Management Plan [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The First Iteration Environmental Management Plan [APP-127] contains a Register of Environmental Actions and Commitments, which includes measures to reduce noise from construction activities including keeping the use of diversion routes to a minimum (commitment NV7). The measures to mitigate the impacts of noise and vibration during construction would include using well-maintained equipment, building elements of the construction away from the site, and using temporary noise barriers for the noisiest activities. The Applicant expects that some of the work will be carried out during night-time closures and weekend work. During the noisiest phases of night-time working, the Applicant will aim to reduce adverse impacts to the shortest duration possible. The Applicant would keep nearby residents informed of forthcoming works, especially works at night, through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects is based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 junctions 17 and 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e. an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between M60 junctions 17 and 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e. some traffic is moved further away). For example, as shown in Figure 5.10 (Operational Human Health Assessment Results) of the Environmental Statement Figures [APP-061] and Table 1.2 of Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080], nitrogen dioxide (NO_2) has no significant change in 2029 at R88 (St Margaret's C of E Primary School) and R130 (Parrenthorn High School), with the Scheme in place. With the Scheme in place neither school is significantly impacted and all modelled results for construction and operation are below the relevant legal limits. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green

Relevant Representations		
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		Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050.

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
RR-048 - Susan Sollazzi		
RR-048	*I object to the proposed scheme at Simister Island Interchange. It is an unsustainable solution to traffic congestion. National Highways should be seeking solutions to alleviate the problems currently caused by the existing road, not exacerbating those issues by increasing capacity. It will increase air, dust, noise, light and vibration pollution, with consequences for citizen health and wellbeing, as well as causing environmental/ecological damage.* *The scheme has significant climate/carbon implications. Carbon emissions would be increased by 62,013 tonnes during construction, and 151,090 tonnes over a 60 year period due to the increased traffic. This makes it even harder for the UK to reach its legally binding climate targets.* *I strongly object to any further loss of Green Belt land, given that Greater Manchester's adopted plan (Places for Everyone) is already due to release more than 2,400 hectares of Green Belt for development. Yet more degradation of green space to provide for cars is totally unacceptable.* *No significant benefits accrue from this NSIP, only small savings of time and modest economic growth, which results in the scheme being very poor value for money with a Benefit to Cost Ratio of just 1.17, defined as low value for money in the DfT's guidance. Given the many disbenefits outlined above, the scheme clearly needs a rethink.*	The Applicant confirms Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes consideration of mitigation for road traffic noise in the form of a "Low Noise Road Surface" with better performance than a conventional low noise surface between J17 and J18 of the M60 (commitment NV4 of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [APP-127]. The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings, depending upon location. Changes in road traffic noise of 3dB or more can be perceptible to people, so the reduction in road traffic noise is likely to be noticeable for some people. Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out that the area affected by the Scheme sits within the Greater Manchester Air Quality Management Area (AQMA) and the impact of the Scheme on air quality within the AQMA has been assessed at relevant locations. Overall, the assessment identified no significant effects, due to air quality, during construction and operation from road traffic changes. The assessment of significant effects are assessed based on National Highways' DMRB LA 105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. The risk of construction dust is considered to be 'high' in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore mitigation measures have been set out in an Outline Air Quality and Dust Management Plan [APP-128] at Appendix A of the First Iteration Environmental Management Plan [APP-127] which includes measures such as wheel washing of construction equipment and vehicles and other dust suppression techniques. The Outline Air Quality and Dust Management Plan [APP-128] will be developed into the Air Quality and Dust 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 [PD1-005]. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit is within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction.

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		National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt. The UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005]. There is little the Scheme can do to influence road user greenhouse gas emissions, therefore 'Decarbonising Transport: A Better, Greener Britain' (Department for Transport, 2021) is the main mechanism to reduce these emissions. It sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The plan includes commitments for zero emission vehicles, delivering a zero-emission freight and logistics sector, maximising the benefits of sustainable low carbon fuels, more choice and better efficiency in the future transport system, hydrogen's role in decarbonising the transport system and increased investment in cycling and walking. The plan recognises, however, that continued high investment in our roads is, and will remain, as necessary as ever, to ensure the functioning of the nation and to reduce congestion which is a major source of greenhouse gas emissions. In addition to the national Transport Decarbonisation Plan, National Highways has published its own 2030/2040/2050 Net Zero Highways Plan. This plan includes commitments to ensure that National Highways' corporate greenhouse gas emissions will become net zero by 2030, its maintenance and construction activities will become net zero by 2040 and road user greenhouse gas emissions on the strategic road network will become net zero by 2050. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these

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		issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified Benefit to Cost ratio (BCR) of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) national objectives for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024 sets out up to date statistics for the strategic road network "In the year ending September 2023 average delay on the SRN was estimated to be 10.3 seconds per vehicle per mile, up from 9.4 seconds per vehicle per mile in the year ending September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)." Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at the Simister Interchange will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states the following "This NPS does not identify a level of capacity to be provided and does not anticipate that new capacity will match forecasted demand growth under any of the scenarios modelled in the National Road Traffic Projections and instead is focused on addressing the worst constraints on the network. Infrastructure interventions can include measures such as addressing pinch points and improving flow aimed at addressing localised issues to help address reliability, predictability, and capacity issues at specific locations, which can in turn improve overall performance of the wider network of local roads and the SRN in that location." Given that the Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west, the Scheme will reduce congestion at one of key pinch points in the strategic road network.
RR-049 - Margaret Stewardson		
RR-049	*One of the main impacts which will affect my day to day life is the use of Simister Lane and particularly Eygpt Lane to make an access point from the M66 to enable works for the loop. I & my young grandson walk*	The Applicant will install temporary accesses and egresses into the offline work areas off the strategic road network as part of the Scheme. This will mean construction traffic can enter and exit the site directly from the M60/M62/M66 motorways without a need to use Egypt Lane and Simister Lane. There will be the requirement to access from the Egypt Lane and

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	the dogs & ride horses along Eygpt Lane everyday. We stable/graze horses on Eygpt Lane, it is already quite dangerous on the Lane and I fear for safety if big lorries & equipment is accessing the Lane.	Simister Lane for the establishment of a work area – including works such as ground investigation, groundwater monitoring, soil resource surveys, ecology surveys, trial holes, archaeology, and the installation of boundary fencing. After the work area has been established then the temporary accesses and egresses into the offline work areas will be utilised. The cable percussion drilling rig is the largest of the equipment and has a transit length of approximately 3.6m and weight of approximately 2400kg. It is noted that both Egypt Lane provides access to the work area over a single lane bridge that has a has a 32-ton weight limit and signs indicating a maximum capacity of one vehicle. The 32-ton weight limit will not be exceeded during any of the pre-commencement works. No heavy-duty vehicles will use Simister Lane/Egypt Lane. This is reserved for light duty vehicles only during early enabling works phase. The Scheme design is not anticipated to increase the isolation of Simister Village but there may be short -term impacts during construction from temporary closure of the public footpath linking Egypt Lane to Hills Lane. The design development and construction methodology will continue to be refined with the aim of reducing the duration of any such closure. Details regarding the management of construction activities and traffic are outlined in the First Iteration Environmental Management Plan [APP-127] and Outline Traffic Management Plan [APP-150]. The First Iteration Environmental Management Plan [APP-127] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005]. The Outline Traffic Management Plan [APP-150] will be developed further into a Traffic Management Plan, secured by Requirement 10 of the draft Development Consent Order [PD-005] which will further detail the specific traffic management measures to be implemented during construction.
RR-050 - Frank John Taylor		
RR-050	*It's a disgrace to the environment*	The Applicant has undertaken an environmental impact assessment which is set out in the Environmental Statement and its accompanying figures and appendices [APP-040 to APP-126] and which accompanies the application for development consent. The Environmental Statement sets out how the Applicant has considered the environmental impacts as a result of the Scheme and the measures identified to avoid or reduce environmental effects where practicable. The Applicant has designed the Scheme in order to avoid or reduce impacts to environmental receptors, as documented within Chapter 3: Assessment of Alternatives of the Environmental Statement [APP-042] and technical Chapters 5 to 15 of the Environmental Statement [APP-044 to APP-054]. The Scheme will also provide environmental enhancements, for example habitat creation which will provide an increase in habitats as evidenced by Appendix 8.12: Biodiversity Net Gain (BNG) Report of the Environmental Statement Appendices [APP-102]. The First Iteration Environmental Management Plan [APP-127] contains the Record of Environmental Actions and Commitments , which details how the mitigation measures identified in the Environmental Statement [APP-040 to APP-126] will be delivered. The First Iteration Environmental Management Plan [APP-127] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft Development Consent Order [PD1-005].
RR-051 - Mark Thomas		
RR-051	*I have received all the paperwork regarding this particular project as I have registered an interest because the project affects my local area and home. I'm finding it difficult to understand how/why this loop will improve the motorway traffic flow? To my mind it will just move the congestion to the Swinton Worsley junction further up the motorway and will in fact add to the travel time and congestion. This will also cause potential traffic problems for supporting roads in the immediate area? Please take my comments for consideration Thank you*	The Applicant confirms that the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period and which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042] ,

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146] The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. These issues indicate that network improvements are required to reduce congestion and delays in the Scheme area. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and at junction 18. In particular, the new loop provided will enable M60 clockwise traffic to flow freely through junction 18 without having to pass through the signalised roundabout. Removing this large traffic flow from the roundabout will then in turn benefit other movements such as M66 to M60 westbound which no longer have to compete for capacity with the M60 clockwise flow at the junction. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. In line with the Road Investment Strategy commitment improvements to other areas of the M60, such as the Swinton/Worsley junction, are not within the scope of the Scheme.
RR-052 - Pamela Thomas		
RR-052a	*I would like to see what screening will be provided to reduce both visual and noise impact of loop being created at Simister Island. I use these MWays on a daily basis and fail to understand how this work will help the problems on the M60, traffic will join the MWay quicker and queues for the Swinton/Worsley intersection will back up quicker and thus cause longer delays around Middleton and Whitefield.*	The Applicant has undertaken a Landscape and Visual Impact Assessment which is included in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and has looked at the impacts of the Northern Loop during the construction and operational phases. The methodology detailing the Landscape and Visual Impact Assessment approach is described in Appendix 7.1: Landscape and Visual Impact Assessment Methodology of the Environmental Statement Appendices [APP-082] which complies with the requirements set out in National Highways' DMRB LA 104 Environmental Assessment and Monitoring and LA 107 Landscape and Visual Effects. The environmental design has aimed to maximise opportunity for landscape integration and reduce the influence of the Scheme on people's views. The assessment has concluded that there will be no significant adverse visual effects once mitigation has sufficiently established. The visual assessment has identified that there would be some beneficial effects (improvements on existing views) in some locations around M60 junction 18 as a result of the Scheme. The environmental design shown on Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-046] shows the location of mitigation planting to offset the visual impacts and also to provide landscape integration of the Northern Loop. Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-046] also includes sections of existing and reinstated noise barriers. A series of visualisations, included in Figure 7.7 Photomontages of the Environmental Statement Figures [APP-067], have been developed which have modelled the Scheme and mitigation planting at year 1 (2029) and year 15 (2044) to show how the landscape design could look, and includes visualisation for the Northern Loop. 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 [APP-082]. The Applicant acknowledges concerns raised over increased noise caused by the loop at Simister Island. Chapter 11 Noise

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		and Vibration of the Environmental Statement [APP-050] presents the noise assessment of the Scheme and includes three-dimensional road traffic noise modelling. This takes into account the horizontal and vertical location of the roads in relation to local residential dwellings in both the existing situation and also with the Scheme. The traffic noise model indicates that there will be a localised increase in road traffic noise close to the new loop and flyover, although there are no adverse impacts predicted on surrounding noise sensitive receptors when road traffic noise from all roads are taken into consideration. This is because the volume of traffic that will be using these sections of the junction are relatively low compared to the larger volumes of traffic using the M60, M62 and M66. As no adverse effects are predicted, screening for road traffic noise has not been considered for the loop. The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. Improvements to other areas of the M60, such as those mentioned in the Relevant Representation, are not within the scope of the Scheme. The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149].
RR-052b	*Money should be spent in the Worsley area to improve the experience of MWay users from Middleton to Bolton.*	The Applicant confirms that the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "*develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines*". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020- 2025, Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. In line with the Road Investment Strategy improvement of the section of the M60 between Barton Bridge and the Trafford centre is not within the scope of this Scheme.

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
RR-053 - Peter Thompson		
RR-053	*1. I object to the proposed scheme at Simister Island Interchange.* *2. National Highways have only ever proposed or examined variations of a roadbuilding scheme, NEVER any non-road building alternatives to reduce traffic demand and its impacts.* *3. Substantial Green Belt surrounds this area; the scheme will prompt secondary / consequential pressure to develop and build on it.*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as a result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. Any further development of land in the Green Belt would be a matter for the local planning authorities
RR-054 - Emma Tristram		
RR-054a	*I object to the proposed scheme at Simister Island Interchange. Rather than increasing capacity, National Highways should be seeking to reduce demand. The scheme will increase carbon emissions.*	The Applicant confirms the Scheme was originally announced in the Road Investment Strategy 1 2015-2020 as one to be developed for the next Road Period which asked National Highways to "develop a comprehensive improvement of the intersection between the M60 (junction 18), M62 and M66 north of Manchester upgrading the critical junction for the traffic heading eastwards over the Pennines". A longlist of options was developed to consider how the issues being experienced on this part of the network could be addressed and to identify those options which best met the Scheme objectives to reduce congestion and improve journey time reliability. The Scheme was committed to as part of Road Investment Strategy 2 2020-2025. Further details on how the Scheme has developed into that which forms the application for development consent can be found in Chapter 3 Assessment of Alternatives of the Environmental Statement [APP-042], Chapter 2 of the Consultation Report [APP-021] and the Case for the Scheme [APP-146]. An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives. Ultimately, implementation of other forms of national and local infrastructure such as National Rail and mass-transit, is dictated by Government policy, not National Highways as the operator and maintainer of the strategic road network. With regards to carbon emissions, the UK's Climate Change Act 2008 commits the UK to reducing carbon emissions to 'net zero' by 2050. The Climate Change Act 2008 also requires the Secretary of State to set legally binding carbon budgets over five-year periods on a trajectory towards 'net zero' and to ensure that net UK carbon emissions do not exceed these budgets. In accordance with relevant guidance and policy, estimated changes in greenhouse gas emissions because of the

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		Scheme have been compared to these carbon budgets in order to assess their potential significance. The results of this assessment, which are presented within Chapter 14 Climate of the Environmental Statement [APP-053], indicate that estimated changes in greenhouse gas emissions because of the Scheme are negligible in comparison to relevant UK carbon budgets. On this basis, changes in greenhouse gas emissions associated with the Scheme are considered unlikely to have a material impact on the ability of the UK Government to meet its carbon reduction targets and are therefore considered to be 'not significant'. In order to reduce the amount of construction phase greenhouse gas emissions, an Outline Carbon Management Plan [APP-142] has been produced and can be found at Appendix O of the First Iteration Environmental Management Plan [APP-127]. The Outline Carbon Management Plan [APP-142] focuses on how the Scheme will reduce carbon emissions during the construction of the Scheme through measures such as potentially using electric (or alternative lower-carbon fuel) construction equipment instead of conventional diesel-powered construction plant and/or the use of low carbon materials. The Outline Carbon Management Plan [APP-142] will be developed into the Carbon 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 [PD1-005].
RR-054b	*The scheme includes a stretch of motorway with no hard shoulder - known as 'smart motorway'. These were banned in April 2023. Edmund King, the AA's president, said then that he welcomed the decision to scrap planned smart motorways and said it was a "victory for common sense", calling for the hard shoulder to be reinstated on existing smart motorways, including a permanent red 'X' and new lane markings. He hoped the government's decision marked the end of "deadly" smart motorways. Existing smart motorways should be removed.*	The Applicant confirms that the Scheme design for the M60 junction 17 to junction 18 maintains the existing Controlled Motorway operating regime, while providing an additional lane. In April 2023 the Government announced that plans for new smart motorways will be cancelled, this included the cancellation of the 11 new smart motorway schemes that were paused from Road Investment Strategy 2 (2020-2025) and the three schemes earmarked for construction during the Road Investment Strategy 3 (2025-2030). This Scheme was not one of the schemes subject to cancellation as it is an existing smart motorway with an existing hard shoulder, also known as a controlled motorway. A controlled motorway is a motorway that uses variable mandatory speed limits to increase capacity and smooth the flow of traffic while retaining a hard shoulder. As part of the Scheme the existing technology will be updated in line with existing National Highways' design standards. The carriageway will be widened to ensure the existing hard shoulder provision can be maintained and improved while providing five lanes in each. Further details can be found on the General Arrangement Plans [APP-005]. The current provision of hard shoulder on the M60 eastbound between junctions 17 and 18 is 51%. Whilst it appears to be a full hard shoulder presently, the cross-sectional width of some of the sections are narrower than the compliant width of 3.0m. To be classified as compliant the hard shoulder must be 3.0m or more, sections which are less than this cannot be classified as a hard shoulder. The Applicant is increasing the provision of hard shoulder as part of the Scheme.
RR-055 - Darren Trousdale		
RR-055	*I live directly off Simister island so the disruption/building works will affect my families well being.*	The Applicant will keep nearby residents informed of forthcoming works through a range of measures including for example, newsletters, emails, text message alerts and, in some situations, visits from a member of the project team. The Applicant will appoint a community relations team who will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Commitments to implementing a community feedback monitoring strategy and the tools required for this are detailed in commitments PHH18 to PHH21 in the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan[APP-127]. The First Iteration Environmental Management Plan [APP-127] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and is secured by Requirement 4 of the draft Development Consent Order [PD1-005].
RR-056 - Jane Wagner		

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
RR-056	*This is going to cause too much disruption to local people for far too long . The area is suffering from poor air quality and the government should be looking to improve this which will not happen if we increase the amount of traffic in the area . We will also see the green belt taken which should be avoided .*	The Applicant has developed the construction methodology in relation to the preliminary design of the Scheme and the space available on the existing road network. The construction programme has been developed to be the shortest duration taking account of the construction methodology and the need to retain the existing number of open traffic lanes at peak times on the M60 / M66 / M62, to minimise the impact on all users of the motorways and local roads. Chapter 5 Air Quality of the Environmental Statement [APP-044] discusses the air quality assessment and concludes that there would be no significant effects, due to air quality, during construction and operation of the Scheme from road traffic changes. The assessment of significant effects is based on DMRB LA105 (Air quality) definitions, which are explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Closer to the Scheme, between junction 17 and junction 18 and around Simister, there is generally a reduction in air pollution concentrations (i.e., an improvement in air quality) with the Scheme in place. This reduction is due to either reduced congestion between junction 17 and junction 18 or, for Simister, due to traffic using the Northern Loop slip road (i.e., some traffic is moved further away). Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as of result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that morel of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt.
RR-057 - Martyn John WEST		
RR-057	*I have made submissions to the HA project manager for provision of lighting in the Hawswater underpass and provided information regarding usage of the underpass as it needs significant work to make it*	The Applicant confirms that the enhancement of existing facilities such as the improvement of the Haweswater Underpass permissive path is not within the scope of the Scheme.

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
	safe.	
RR-058 - John Whitehead		
RR-058	*Unnecessary and would take green belt land*	The Applicant confirms that the need for and benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. They confirm that the Scheme is necessary because the Applicant's analysis of various traffic data indicates that there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The amount of Green Belt land within the Order Limits has reduced by 19 hectares, from 68 hectares to 49 hectares as a result of Places for Everyone (PfE) which was adopted in March 2024. PfE is now part of the statutory development plan for Bury and has removed the land in the north east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit removed from the Green Belt. As the Order Limit also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21ha of the Order Limit within the Green Belt comprises the existing motorway infrastructure. The impact of PfE as referenced above is that those parts of the Scheme comprising the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 are no longer located within the Green Belt. The other parts of the Order Limits surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 remain within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer in the Green Belt. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances are the national need for the Scheme, the benefits of the Scheme, in terms of reducing congestion and providing additional capacity which overall leads to a reduction in travel time, and the lack of alternatives with less impact on the Green Belt.

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
AS-014 - Scott Brady		
AS-014	*I am writing to bring to your attention a matter of significant concern regarding the bats that reside near our homes, particularly behind our houses, beyond the garden fences, and adjacent to the motorway verge in the trees where recent planning consent is being sought for the M60 motorway.* *My neighbours and I have observed these bats regularly flying at dusk, and we can confirm that they are a frequent sight in the evenings, gliding through our driveways and around our houses. The presence of these bats is wellknown among us, with sightings occurring daily along our road.* *As you can appreciate, bats are protected species, and their roosting sites and habitats must be preserved and respected. I feel it is imperative for us as a community to ensure that any work planned for the M60 construction considers the well-being of these bats and their natural environment. We kindly request that thorough investigations and assessments be carried out to ensure their protection.* *Your attention to this matter would be greatly appreciated, as it is not only about wildlife preservation, but also about the potential impact that construction may have on the local ecosystem that many of us value in our daily lives.*	The Applicant has undertaken a suite of bat surveys as detailed within Appendix 8.3 Bat Survey Report of the Environmental Statement Appendices [APP-091]. Surveys included a ground assessment of all trees within the survey area to identify potential roost features. Where appropriate further dusk emergence surveys and climbing surveys were undertaken to confirm presence of bat roosts. Bat activity transects, static automatic detector surveys and vantage point surveys were also undertaken to confirm the locations of key foraging and commuting habitats. This data was used to inform an assessment of the impacts of construction and operation of the Scheme. Paragraphs 8.10.100 to 8.10.116 and 8.10.248 to 8.10.260 of Chapter 8 Biodiversity of the Environmental Statement [APP-047] provide the assessment of construction and operation impacts on bats. The assessment concludes that with mitigation measures (outlined in Section 8.9 of Chapter 8 Biodiversity of the Environmental Statement [APP-047], there would be no significant (i.e. moderate, large or very large) adverse effects on bats. Mitigation measures are detailed in the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan and are secured through Requirement 4 of the draft Development Consent Order [PD1-005].
AS-015 - Theresa Dolan		
AS-015	*I would like to draw your attention to the bats that reside at the back of our houses beyond the garden fences onto the motorway verge and in the trees where the intended work for planning consent is currently being sort on the M60 motorway. The bats can be seen flying at dusk from the motorway through our driveways and around our houses. My neighbours and I can confirm these bats are seen daily in the sky along our road that we live [REDACTED TEXT].* *We are also concerned about the hedgehogs that use our gardens to nest and to pass through onto adjoining Prestwich Heys fields. We suspect they also pass via motorway verges and into our gardens. I will be attending the meeting on 11th September to raise this again as myself and other neighbours are concerned that these bats and hedgehogs that are protected by law are not protected here if this planning consent is agreed. Please can you reply to my email confirming receipt of my concerns about the surrounding wildlife in the area we live which will be affected by these proposals.*	The Applicant has undertaken a suite of bat surveys as detailed within Appendix 8.3 Bat Survey Report of the Environmental Statement Appendices [APP-091]. Surveys included a ground assessment of all trees within the survey area to identify potential roost features. Where appropriate further dusk emergence surveys and climbing surveys were undertaken to confirm presence of bat roosts. Bat activity transects, static automatic detector surveys and vantage point surveys were also undertaken to confirm the locations of key foraging and commuting habitats. This data was used to inform an assessment of the impacts of construction and operation of the Scheme. Paragraphs 8.10.100 to 8.10.116 and 8.10.248 to 8.10.260 of Chapter 8 Biodiversity of the Environmental Statement [APP-047] provide the assessment of the impacts on bats from the Scheme's construction and operation. Hedgehogs are a priority species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. As outlined in Paragraph 8.6.2 of Chapter 8 Biodiversity of the Environmental Statement [APP-047], protected and notable species records were obtained for a 2km survey area around the Order Limits. As stated in Paragraph 8.7.98 of Chapter 8 Biodiversity of the Environmental Statement [APP-047], brown hare and hedgehog were recorded incidentally within habitats to the north-east and north-west of the Scheme in low numbers. Both are Manchester Local Biodiversity Action Plan species. Grassland, arable fields and hedgerow habitats within and around the Scheme are likely to be used by both brown hare and hedgehog. Paragraphs 8.10.170 to 8.10.183 and 8.10.296 to 8.10.300 of Chapter 8 Biodiversity of the Environmental Statement [APP-047] provide the assessment of construction and operation impacts on priority species, including hedgehog. The assessment concludes that with mitigation measures (outlined in Section 8.9 of Chapter 8 Biodiversity of the

Relevant Representations		
Reference	**Comment**	**Applicant's Response**
		Environmental Statement [APP-047], there would be no significant (i.e. moderate, large or very large effects) adverse effects on bats or hedgehogs. Mitigation measures are detailed in the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [APP-127] which will be developed into the Second Iteration Environmental Management Plan and will be secured through Requirement 4 of the draft Development Consent Order [PD1-005].