

M60/M62/M66 Simister Island Interchange

TR010064

7.19 APPLICANT'S RESPONSES TO DEADLINE 1 SUBMISSIONS

APFP Regulation 5(2)(q)

Planning Act 2008

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

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(Applications: Prescribed Forms and
Procedure) Regulations 2009**

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

APPLICANT'S RESPONSES TO DEADLINE 1 SUBMISSIONS

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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 submissions made at Deadline 1. These submissions were published on the Planning Inspectorate website on 26th September 2024.
- 1.1.3. Below is a summary of the contents of this document:-
 - Table 2-1 - contains a full schedule of the Applicant's responses to Written Representations made at Deadline 1. In total, ten submissions were received.
 - Table 3-1 contains the Applicant's responses to submissions made by Bury Metropolitan Borough Council and the Environment Agency in response to actions arising from Issue Specific Hearing 1 held on 12th September 2024.
 - Table 4-1 contains the Applicant's responses to written submissions of oral accounts provided by attendees of the Open Floor Hearing 1 held on 11th September 2024. In total, three submissions were received.

2. Applicant's Responses to Written Representations received at Deadline 1

2.1.1. Table 2-1 below documents the Applicant's responses to written submissions provided by Interested Parties at Deadline 1.

Table 2-1 - Applicant's Responses to Written Representations received at Deadline 1

Written Representations		
Reference	Comment	Applicant's Response
REP1-033 – Joseph Holt Limited		
REP1-033a	<p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>In preparing our Representation we have been mindful of the Statement of Reasons (April 2024), set out by National Highways as their justification for the making of the proposed Order.</p> <p>In summary, our representations are as follows:</p>	Noted.
REP1-033b	<p>1. Purpose of the Acquisition</p> <p>In the Statement of Reasons, National Highways have failed to justify why the land falling within our client's ownership is required.</p> <p>There are two parcels of land within our client's interest to be acquired:</p> <ul style="list-style-type: none"> - 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. <p>Appendix A of the Statement of Reasons fails to detail the justification for the</p>	The Applicant confirms that, as set out in Annex A of the Statement of Reasons, plot 1/33a as shown on the Land Plans [AS-005] is required temporarily by the Applicant to facilitate Work No. 2 and associated ancillary works such as amendments to the motorway communications infrastructure associated with the new cantilever gantry that is to be provided south of plot 1/33a. Work No. 2 also includes the installation of a new retaining wall south of plot 1/33a to accommodate the new hard shoulder and regrading of the existing cut slope, installation of access steps for maintenance from the top of the embankment to the new motorway technology cabinets and new gantry. The existing technology and street lighting buried infrastructure and above ground assets are located very close to the existing boundary fencing and, as such, it is envisaged that plot 1/33a will be temporarily used in the event that any fence panels need to be temporarily removed to undertake works to the technology and street lighting infrastructure. Temporary inspections will also be required along the rear of the existing barrier in this area whilst construction works are undertaken, in addition to any works which may be required to vegetation encroaching into the highway

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	<p><i>acquisition of each land parcel. The justification relating to our client's land 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.</i></p> <p><i>We do note the M60/M62/M66 Simister Island Interchange - map book 2 - land use plans (July 2023) describes the need for the land take as:</i></p> <p><i>"Land located within 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."</i></p> <p><i>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 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.</i></p> <p><i>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.</i></p> <p><i>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 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</i></p>	<p>boundary.</p> <p>The blue land identified as plot 1/33b and shown on the Land Plans [AS-005] is required for the permanent acquisition of rights for future maintenance of the Scheme. 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 in respect of plot 1/33b. 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.</p> <p>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.</p> <p>It should also be noted, that "map book 2 – land use plans (July 2023)" is now obsolete and the Land Plans [AS-005], Statement of Reasons [APP-018] and Book of Reference [AS-010], should be used for purposes of referencing how the Scheme intends to use land within the Order Limits. The document referred to as "map book 2" was prepared for the purposes of statutory consultation and has been superseded by the DCO application documents.</p>

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	<p><i>compulsorily acquired and that the land to be taken is no more than is reasonably necessary for that purpose and that it is proportionate."</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	
REP1-033c	<p>2. Consideration of Alternatives</p> <p><i>Section 5.2.5 of the Statement of Reasons refers to Paragraphs 8 to 10 of the CA Guidance, stating "all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored."</i></p> <p><i>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 alternative access options which have not been considered.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>The Applicant confirms that it has considered all reasonable alternatives to compulsory acquisition, including by considering alternative access arrangements by reference to their suitability and risks. 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]) has been discounted as it 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.</p> <p>The Applicant would like to re-affirm, that only new rights over land belonging to Joseph Holt Ltd are being sought by the Scheme.</p>
REP1-033d	<p>3. Public Interest</p> <p><i>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</i></p>	<p>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 compulsory acquisition or temporary possession of plot 1/33b 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.</p>

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	<p><i>purse) and mitigating the impact on land interests".</i></p> <p><i>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. The impact of the temporary loss of car park land would have a significant impact on the 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.</i></p> <p><i>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.</i></p>	<p>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 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.</p>
REP1-033e	<p>4. Human Rights</p> <p><i>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.</i></p>	<p>The Applicant considers the compulsory acquisition of permanent rights over plot 1/33b at the Frigate Public House as shown on the Land Plans [AS-005] to be 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 considering reasonable alternatives and only seeking permanent rights for future maintenance access for the Scheme rather than seeking to compulsorily acquire the land on a permanent basis.</p> <p>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.</p>
REP1-033f	<p>5. Conclusion</p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>The Applicant has addressed these points in the responses given above.</p>

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REP1-034 – Louise Holland		
REP1-034a	<p><i>The proposed scheme at Simister Island Interchange does not take into account the Places for Everyone (PfE) development of 1.2 square m of industrial space and 1550 houses that has recently been granted in the local area. There has been no consideration of how much this development will affect the local area and the knock on effect towards the proposed scheme. The modelling for the scheme has only considered what is currently in place and doesn't mitigate any future developments, which have already been agreed, so must be included.</i></p>	<p>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 Places for Everyone (PfE) in preparing the application for the Scheme. The Applicant acknowledges the relevance that the Simister Island area and the Scheme has to PfE and the proposals within that plan for the Northern Gateway under Policies JPA1.1 (Heywood/Pilsworth) and JPA1.2 (Simister and Bowlee). Further details on how the Scheme supports the PfE can be found in Chapter 6 of the Case for the Scheme [APP-146].</p> <p>A cumulative effects 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]. It is supported by Appendix 15.1: Inter Project Cumulative Effects of the Environmental Statement [APP-125]. The assessment has been carried out in accordance with the Inspectorate's (2019) Advice Note Seventeen: Cumulative Effects Assessment. It 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. The part of the Northern Gateway at Heywood/Pilsworth is allocated under Policy JPA1.1 in Places for Everyone, which is within both Bury Council and Rochdale Borough. The land within Rochdale Borough already has planning permission under reference 16/01399/HYBR and has been included within the inter-project cumulative effects assessment as detailed in Appendix 15.1: Inter Project Cumulative Effects of the Environmental Statement [APP-125]. At the time of preparation of the Environmental Statement, no planning applications had been submitted for the JPA1.1 allocation within the Bury Council area and this remains the case at the present time. Bury Council is currently in the process of producing a draft Northern Gateway Development Framework for the part of JPA1.1 in the Bury Council area, with the following brief: -</p> <p><i>The objective of this document is to provide more detailed information on how the site is likely to be developed through a high-level masterplan, that will identify broad development parcels and areas of the site that will be protected. The NGDF will also set out how new employment floorspace, housing and supporting infrastructure will be provided in a coordinated and phased approach. Ultimately the NGDF will be adopted as a Supplementary Planning Document (SPD) and will be a material planning consideration when determining planning applications on the site.</i></p> <p>Detailed information on the quantum and potential environmental impacts of development for JPA1.1 is only available from the Rochdale planning application, whilst the land within Bury is still at a relatively early stage in the development process. It is only possible to include a foreseeable development in the assessment of cumulative effects if a sufficient level of detail is available for a robust assessment to be undertaken, As no planning applications have currently been submitted for the JPA1.1 land within Bury, sufficient information is not available to undertake a detailed assessment of cumulative effects on air, noise, light, vibration, water, carbon and traffic for this part of JPA1.1. Furthermore, any future planning applications submitted for JPA1.1 would be expected to undertake their own assessment of cumulative effects if they are a type of development which requires an Environmental Statement.</p> <p>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</p>

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		<p>the future</p> <p>Section 5 of the Case for the Scheme [APP-146] 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 principle by policy JPA1.1 of PfE and, as noted above, the part of the Northern Gateway in Rochdale which already has planning permission.</p> <p>The Local Impact Report [REP1A-001] submitted by Bury Metropolitan Borough Council at Chapter 3 sets out the local planning authority's assessment of the Scheme against the policies of PfE based on the information submitted by the Applicant for the DCO application.</p> <p>The Applicant has responded to the Local Impact Report, including Policy JP-S5, as part of its further responses to representations received after Deadline 1.</p>
REP1-034b	<p><i>Residents who travel regularly on the motorways have already feedback to National Highways that this is not where the issue is, it is at M60 Worsley where the bottlenecks appear. This will further impact local residents as construction will take place at night over a three and half year period, causing unacceptable noise and disturbance. Night time motorway closures will transfer more traffic onto the local road network, increasing noise and disturbance.</i></p>	<p>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 DCO application 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 commitment, improvements to other areas of the M60, such as the Swinton/Worsley junction, are not within the scope of the Scheme.</p> <p>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 (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.</p>

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		<p>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.</p>
REP1-034c	<p><i>Simister and Bowlee currently have illegal air quality readings due to the motorways (M60, M62 and M66) surrounding the scheme. Through a Freedom of Information request Highways England provided the readings on the Strategic Road Networks around Simister and Bowlee in 2015/2016 were:</i></p> <p><i>75% at illegal limit 15% at legal limit 10% not full year readings</i></p> <p><i>With the introduction of Places for Everyone with 1.2 million square metres of industrial and 1550 homes this will undoubtedly increase already illegal levels of carbon emissions even further.</i></p>	<p>Past monitoring data from 2015 to 2021 is presented in Table 1.5 in Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079], which includes data around the Scheme in 2015 and 2016 and shows that there were historical exceedances of the annual average nitrogen dioxide (NO₂) air quality objectives and limit values close to the motorway network and the Scheme. Importantly, however, future year concentrations will have lower values due primarily to the replacement of older vehicles with newer vehicles, that are less polluting.</p> <p>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 assessment is based on the National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality) standard, which is explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. The methodology takes into account the replacement of older vehicles with newer vehicles, that are less polluting, in line with national projections, which results in lower concentrations in future years. Base year (2018) modelled concentrations, discussed in paragraphs 5.7.23-25 and 5.7.32-34 of Chapter 5 Air Quality of the Environmental Statement [APP-044], in line with monitored data, show air quality exceedances of the annual average nitrogen dioxide (NO₂) air quality objectives and limit values close to the motorway network. However, by the modelled construction year and opening year the NO₂ modelled results, discussed in Section 5.10 of Chapter 5 Air Quality of the Environmental Statement [APP-044], are either below the relevant limit values and air quality objectives 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 legal limits or objectives. Closer to the Scheme, between M60 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).</p> <p>Places for Everyone (PfE) is a joint plan for nine Greater Manchester Districts (excluding Stockport Borough Council) and was adopted in March 2024. Prior to adoption, the plan was subject to an independent examination by the Planning Inspectorate on behalf of the Secretary of State for Levelling Up, Housing and Communities (now subsequently renamed to the Ministry of Housing, Communities and Local Government). The assessments relating to the impact of the plan included an Integrated Impact Assessment (IIA). That IIA assessed the impacts of the</p>

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Reference	Comment	Applicant's Response
		plan's policies against numerous topics including climate resilience and greenhouse gases. As such, the impact of the plan on carbon was determined to meet the necessary legal tests required to adopt the plan.
REP1-034d	<i>Point 17 Page 233 of the PfE states we will "incorporate appropriate noise and air quality mitigation measures and high-quality landscaping along the M60 motorway corridors and local road network if required within the allocation." National Highways have already tried this through the Barrier erecting study and it failed. The before and after results were provided and it was confirmed there was no reduction in pollution.</i>	<p>Erection of new barriers is not a mitigation measure which has been identified for the Scheme, although the existing noise barrier alongside the M60 J18 clockwise off-slip road to the M66, which will be removed to allow for the construction of the new M60 J18 clockwise free-flow link, will be replaced like-for-like (see paragraph 11.9.4 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]).</p> <p>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 adjacent to the M60 between J17 and J18, 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.</p> <p>Chapter 5 Air Quality of the Environmental Statement [APP-044] provides details of the methodology used to assess air quality impacts as a result of the Scheme. The assessment is based on National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality), which is explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. Overall, there were no significant effects, due to air quality, during operation and construction from road traffic changes and therefore no mitigation is proposed. The risk of construction dust is considered to be 'high', and therefore best practice mitigation measures have been set out in an Outline Air Quality and Dust Management Plan at Appendix A of the First Iteration Environmental Management Plan [APP-128] which include activities like 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 [REP1-004].</p>
REP1-034e	<i>National Highways, Bury Council and GMCA must work together to mitigate the effect of both this scheme and PfE to ensure the health and well being of local residents including young people at the two current schools a few hundred metres away from the sheme and the proposed school due to be built as part of the PfE. The public services involved in these developments have a duty of care as this will increase the health inequalities and will definitely affect people's health.</i>	The Applicant is working with Bury Metropolitan Borough Council to ensure that the Scheme is delivered in line with the Environmental Statement relating to the Scheme and that it delivers on the commitments of the Register of Environmental Actions and Commitments contained in the First Iteration Environmental Management Plan [REP1-010] and mitigation measures identified therein. Similarly, separate to this Scheme, the Applicant as owner and operator of the strategic road network, will be engaged by Bury Metropolitan Borough Council and Greater Manchester Combined Authority as required.
REP1-035 – Massey, Kilroy, and Brown		
REP1-035a	<p>Introduction</p> <p>1.1 Urban Green are currently acting on behalf of various land promoters and landowners with regards to land adjacent to the M66 in Bury. This land is referred to as 'Castle Brook - land off Castle Road / Griffie Lane, Unsworth' and forms part of the land allocated for development within the Places for Everyone development plan (PfE). This submission is made specifically on behalf of the following landowners as Affected Parties:</p> <ul style="list-style-type: none"> • Plot 4/6 	Noted.

Written Representations		
Reference	Comment	Applicant's Response
	<p><i>Glen Derek Kilroy / Julie Dawn Kilroy, Brick House Farm, Castle Road, Bury BL9 8QS</i></p> <ul style="list-style-type: none"> • <i>Plot 4/6, 4/8a & 4/8b</i> <p><i>Allen John Massey 239 Hollins Lane Bury BL9 8AS / Phillip David Massey & Heather Massey 13 Castle Road Bury BL9 8JL</i></p> <ul style="list-style-type: none"> • <i>Title – GM247135 – although not noted as Affected Party the landowner utilises a right of access along Griffe Lane as Plot 4/6 – Category 2 Karl Brown, 14a Manor Road, Cheadle Hulme, Stockport, SK8 7DQ</i> 	
REP1-035b	<p>Places for Everyone (PfE)</p> <p><i>2.1 As you will be aware, the PfE is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. It has been published by the GMCA on behalf of the nine districts.</i></p> <p><i>2.2 The plan is a joint development plan for the nine districts which determines the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces whilst protecting Green Belt land.</i></p> <p><i>2.3 It also ensures that all new developments are sustainably integrated into Greater Manchester's transport network and/or supported by new infrastructure.</i></p> <p><i>2.4 The Inspectors' Report, received on 14 February 2024, concluded the examination of the plan. The Inspector stated that all legal requirements had been met and it satisfied the requirements referred to in Section 20(5)(a) of the 2004 Planning and Compulsory Purchase Act. The Plan was considered sound, and was adopted on March 21, 2024, by all Council's of the combined authority.</i></p> <p><i>2.5 The Places for Everyone Plan now forms part of the Statutory Development Plan for each of the nine PfE authorities as of March 21, 2024.</i></p> <p><i>2.6 The PfE:</i></p> <ul style="list-style-type: none"> • <i>sets out how the nine boroughs should develop up until 2039;</i> • <i>identifies the amount of new development that will come forward across the 9 districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;</i> • <i>supports the delivery of key infrastructure, such as transport and utilities;</i> • <i>protects the important environmental assets across the city region;</i> • <i>allocates sites for employment and housing outside of the existing urban area; and</i> • <i>defines a new Green Belt boundary for Greater Manchester</i> <p><i>2.7 Supplementary planning documents are being produced by Bolton, Bury,</i></p>	<p>The Applicant notes the background information provided on Places for Everyone (PfE) and the narrative on land ownership allocations for Messrs. Kilroy, Brown and Massey.</p>

Written Representations		
Reference	Comment	Applicant's Response
	<p><i>Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. These SPDs will support the implementation of the PfE Plan</i></p> <p>JPA Allocation 1.1 Heywood / Pilsworth (Northern Gateway)</p> <p><i>2.8 This allocation forms part of the wider cross boundary strategic allocation JPA 1 Northern Gateway. An extensive area located around Junction 18 of the M60 motorway extending east to Junction 19 of the M62 and north to Junction 3 of the M66. The Northern Gateway straddles the districts of Bury and Rochdale and is positioned at a strategically important intersection around the M60, M62 and M66 motorways. As such, it represents a highly accessible opportunity for growth in Greater Manchester.</i></p> <p><i>2.9 The allocation 1.1 at Heywood/Pilsworth provides an opportunity for a substantial and high quality employment-led development. The scale and location of this allocation will help to rebalance the Greater Manchester economy, ensuring the joint plan plays its part in driving growth within the north of England and enable Greater Manchester to be competitive both nationally and internationally.</i></p> <p><i>2.10 A masterplan is currently being worked up on behalf of the overall site promoters, that will be approved and adopted by Bury MBC in accordance with the Development Plan and JPA1.1 allocation.</i></p> <p><i>2.11 Part of this allocation is to deliver a new community to the north as outlined in the allocation policy wording as follows:</i></p> <ul style="list-style-type: none"> <i>• (iii.) Deliver around 200 new homes, which includes an appropriate mix of house types and sizes and the provision of plots for custom and self-build housing, in the west of the allocation off Castle Road ensuring that an appropriate buffer is incorporated to separate this part of the allocation from the wider employment area and that appropriate highways measures are in place to prevent the use of residential roads by traffic associated with the wider employment area;</i> <p><i>2.12 This area lies wholly within the authority of Bury MBC and is allocated for residential development off Castle Road. Part of this land allocated for residential development is directly affected by the M60/M62/M66 Simister Island Interchange Project.</i></p> <p><i>2.13 This representation relates specifically to this land and is made on behalf of the Affected Parties, plot 4/6 and 4/8 – Kilroy & Massey as noted within the submitted scheme details.</i></p> <p>JPA 1.1 – Residential Parcel</p> <p><i>2.14 The land ownerships for the residential element of the allocation are demonstrated below:</i></p>	

Written Representations		
Reference	Comment	Applicant's Response
	<p>2.15 There is a section of land immediately off the Castle Road bridge abutting the Brown land as highlighted in yellow that is owned by National Highways back to the development of the M66. This land is required to aide in facilitating access for the allocated residential development. A request will be made from Bury MBC / the residential development team to National Highways separately in this regard.</p> <p>2.16 A coordinated solution is required with National Highways team and the consultant team working up the residential proposals to seek agreement on the acquisition of rights over to enable the allocated residential development.</p> <p>2.17 The emerging masterplan for this proposed residential element of the allocation is attached and included below</p> <p>2.18 The land promoters and their consultant team are currently working jointly under a PPA with Bury MBC working toward a planning application, with submission indicated for early 2025.</p> <p>2.19 The residential parcel will be accessed from Castle Road, allowing for a future public transport route to the wider employment site to the east. There are ongoing meetings and discussions with Bury MBC on the detail, quantum of development and coordination within the wider site masterplan currently being prepared on their behalf.</p> <p>M60/M62/M66 Simister Island Interchange Project</p> <p>2.20 As already highlighted within the submitted details the project proposals directly affect land noted as plot numbers 4/6 and 4/8 on the submitted Land Plans.</p> <p>4/6 Kilroy Land</p> <p>2.21 The Kilroys own various parcels of land including the access road of Griffie Lane which is proposed to be used for temporary access during construction and with permanent rights for maintenance access</p> <p>Brown land – title GM247135</p> <p>2.22 Brown owns land under the above title with access from Griffie Lane and thus affected as per plot 4/6</p> <p>4/8 Massey Land</p> <p>2.23 The Masseys land is proposed to construct an attenuation pond for drainage from the M66, with the respective inlet and outfall pipes along with a permanent access route for maintenance.</p>	
REP1-035c	<p><u>3. Proposal Considerations</u></p> <p>4/6 Kilroy Land - Griffie Lane</p> <p>3.1 Griffie Lane is privately owned as highlighted and is currently used as</p>	<p>Kilroy Land - Griffie Lane</p> <p>The Applicant confirms that Griffie Lane will be used for temporary access for the construction of Pond 2 and any associated drainage infrastructure. Griffie Lane will only be used for a short duration within the overall Scheme construction programme. Local access will be maintained at all times throughout this period. The Applicant will keep</p>

Written Representations		
Reference	Comment	Applicant's Response
	<p><i>residential access to multiple properties as well as both bridleway / public right of way in everyday use. As such consideration needs to be given in detail in planning the construction phase in maintaining those access's and controlling construction vehicular uses, as well as ensuring any necessary repairs and reinstatement following completion of construction. National Highways will also require permanent access on completion from Griffie Lane to the proposed attenuation pond for maintenance purposes noted under the proposed permanent acquisition of new rights over parts of the land.</i></p> <p><i>3.2 It should be noted that there will be new infrastructure delivered for the proposed residential development that will change how vehicles currently access the area and as such the permanent acquisition of new rights over Griffie Lane may not provide the long-term solution, as Griffie Lane is proposed to be non-vehicular within the emerging proposals, currently proposed to be an active travel route / green corridor.</i></p> <p><i>A coordinated solution is required with National Highways team and the consultant team working up the residential proposals to ensure construction and future maintenance needs are met.</i></p> <p>4/8 – Massey Land</p> <p><i>3.3 The land is allocated for residential development and the proposed attenuation pond does not currently take into account the future use within the JPA 1.1 allocation. It seems to assume that the levels and existing land use and as such would restrict the allocated residential development use. This is not the case, the land will require regrading to create the respective development platforms for residential use alongside the necessary infrastructure and drainage design. If this is the only suitable location for the attenuation pond then the proposed permanent acquisition of this land should take account of the allocated residential use.</i></p> <p><i>3.4 There are also health and safety considerations that require factoring in with the adjacent school and community playing field and recreation uses along with the future residential development proposals.</i></p> <p><i>A coordinated solution is required with National Highways team and the consultant team working up the residential proposals to ensure the location and position of the proposed drainage features work for all the proposals, along with construction and future maintenance needs being met.</i></p> <p><i>The initial consideration from the residential consultant team is to rotate the pond along the southern boundary to the existing golf course and also to consider whether the pond could provide a shared SUDs solution for both the M66 and the residential parcel. This is indicated on the marked up National Highways Land Plan as below, as well as the emerging residential masterplan for JPA 1.1 as above.</i></p>	<p>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 the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around access and other disruption which may affect residents. A full photographic pre-condition survey of Griffie Lane will be undertaken prior to the start of construction to assess any changes in condition of the road once the period of temporary construction use has finished.</p> <p>The Applicant would welcome the opportunity to engage with the relevant stakeholders as the residential proposals come forward to ensure construction and future maintenance needs are met.</p> <p>Massey Land</p> <p>The Applicant has had regard to the development and adoption of Places for Everyone (PfE) in designing the Scheme and preparing the DCO application. The Applicant acknowledges the relevance that the Simister Island area and the Scheme has to PfE and the proposals within that 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].</p> <p>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.</p> <p>Following statutory consultation and feedback received from the landowner, the area for permanent acquisition around Pond 2 was 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]. Rotating the pond along the southern boundary to the existing golf course would require construction of a new outfall to Castle Brook and due to the topography of the existing land, require a greater footprint for the pond than the current proposal, due to the cutting / excavation required. The existing outfall, which presently enables surface water from the M66 to reach Castle Brook, is located north east of the current pond 2, where the Order Limits abut Castle Brook. It is for this reason that the pond is orientated and located as it is, so that the pond can connect into that existing network without the need to construct a new outfall and carrier pipe system to Castle Brook from the pond.</p> <p>The pond is required for water quality treatment only, and not attenuation. Paragraphs 49 and 50 of Department for Transport (DfT) Circular 02/2013 specifically address the limitations of third party developments making connections to the Applicant's drainage infrastructure and as such it will not be feasible for the SUDs from the JPA 1.1 development utilising the Applicant's pond.</p> <p>Programme</p> <p>The Applicant confirms that Castle Road and Griffie Lane will be used for temporary access for the construction of</p>

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Reference	Comment	Applicant's Response
	<p>Programme 3.5 The programme for construction also requires consideration in detail. There is the potential that the Castle Road access could be being utilised for the development and construction of the residential parcels and/or future residents at the same time as the National Highways project subject to the final delivery programme. It is intended that a planning application for residential development is made early 2025 with a potential start on site by 2026 subject to the relevant consents. Thus, there are potential implications for the existing residents and access, the residential development along with the National Highways contract.</p> <p>A coordinated construction programme is required with National Highways team and the consultant team working up the residential proposals to ensure the relevant traffic management and access requirements are met.</p>	<p>Pond 2 and any associated drainage infrastructure. The construction programme for the Scheme is due to start in 2026 and last for approximately three years, however, the use of Castle Road for construction will be for a much shorter duration within this overarching construction programme. Whilst the programme is still being developed, it is likely that the construction of Pond 2 and associated drainage infrastructure will take place over a period of months within the overall Scheme programme, during which construction traffic will require regular access to the area via Castle Road and Griffie Lane. Once the pond has been constructed, access may still be required at a much lower frequency for further inspections and maintenance during the remainder of the construction programme.</p> <p>Local access will be maintained at all times throughout this period. 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 the community relations team. The community relations team will be available throughout the construction of the Scheme to discuss concerns around access and other disruption which may affect residents.</p>
REP1-036 – National Grid Electricity Transmission Plc		
REP1-036a	<p>Introduction We are instructed by National Grid Electricity Transmission Plc ('NGET') in relation to the application made by National Highways ('the Applicant') for a Development Consent Order ('the draft Order') for the M60/M62/M66 Simister Island Interchange ('the Project'). This written representation is made on behalf of NGET.</p> <p>The proposed junction improvement works are located at M60 J18 (Simister Island), north of Manchester. 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.</p> <p>Chapter 2 of the Environmental Statement states that the Project interacts with NGET's assets including high voltage (HV) overhead cables and within the Order Limits there are two NGET pylons, with several more located in close proximity to the Project. Running between the pylons are overhead cables. It is stated that the overhead cables would not be affected by the design for the Scheme, however, the construction work methodology would be impacted.</p> <p>The Applicant is seeking permanent acquisition and temporary possession over several parcels of land which contain NGET assets, including Plots 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 acquisition and temporary possession over parcels which contain rights held by NGET to maintain their assets included within sheets 1-3 of the Land Plans.</p> <p>NGET is part of the National Grid group, which owns and operates the</p>	<p>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 to engage 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.</p> <p>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.</p> <p>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 [REP1-004] and there is no adverse effect on NGET's current or future statutory obligations.</p>

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Reference	Comment	Applicant's Response
	<p><i>electricity transmission infrastructure in the UK. National Grid holds the Transmission Licence for England and Wales and is thus obligated to develop and maintain an efficient, co-ordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in Section 9 of the Electricity Act 1989 (the Electricity Act). As a responsible statutory undertaker, NGET'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.</i></p> <p><i>NGET does not object in principle to the proposals. However it is imperative that relevant and adequate protections are put in place so not to compromise NGET's ability to deliver its statutory undertaking. NGET wishes to make a written representation to the Project in order to protect their position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits ('the Order Limits') in addition to protecting its future proposed infrastructure.</i></p> <p><i>NGET will 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 located within or in close proximity to the Order Limits 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.</i></p>	
REP1-036b	<p><u>NGET Land and Infrastructure Impacted</u> <i>The documentation and plans submitted for the Project have been reviewed in relation to impacts on NGET's existing apparatus and land interests located within this area. NGET have a Category 1 and Category 2 interests in several plots including Plots 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.</i></p> <p><i>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:</i></p> <ul style="list-style-type: none"> • VJ 275kV OHL – Kearsely – Whitegate 1; Kearsley – Whitegate 2 • Associated cable fibres 	Noted. The Applicant refers NGET to the response at REP1-036a above.
REP1-036c	<p><u>Compulsory Acquisition Powers</u> <i>NGET notes that the Book of Reference and Land Plans indicate that powers for the compulsory acquisition of land, temporary possession of land and extinguishment of rights are included over NGET's operational land and industrial apparatus. NGET strongly opposes any compulsory acquisition or extinguishment of rights over its operational land. Any such powers would</i></p>	Noted. The Applicant refers NGET to the response at REP1-036a above.

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Reference	Comment	Applicant's Response
	<i>cause serious detriment to NGET's ability to comply with its statutory duties.</i>	
REP1-036d	Protective Provisions <i>NGET requires its protective provisions to be included within the draft Order to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards, NGET is currently in the process of agreeing with the Applicant the protective provisions along with any supplementary agreements which may be required. NGET will keep the Examining Authority updated in relation to these discussions.</i>	The Applicant has included protective provisions in the draft Development Consent Order [REP1-004] in favour of electricity undertakers. The Applicant is however in correspondence with NGET with a view to agreeing the form of wording of those protective provisions.
REP1-036e	Summary <i>NGET reserves the right to make further representations as part of the examination process but in the meantime will negotiate with the Applicant with a view to reaching a satisfactory agreement.</i>	Noted.
REP1-037 – Natural England		
REP1-037a	<i>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</i> <i>Our position regarding key areas that fall within our remit including impacts on internationally designated sites, nationally designated sites, protected species, biodiversity net gain, soils and best and most versatile agricultural land and ancient woodland and ancient/veteran trees is as set out in our Relevant Representations (RR – 476886, dated 4 July 2024). We consider all these issues to be successfully resolved (subject always to the appropriate requirements being adequately secured).</i> <i>Natural England has agreed and signed a Statement of Common ground with the applicant. The applicant will be copying you in on the signed version. This confirms that we have no remaining issues resulting from this Project. Natural England therefore will not be submitting a full written Written Representation or commenting further on the documents submitted after the acceptance of the application for examination. As all our remaining issues have been successfully resolved, Natural England do not consider that we are required to attend, make representations or attend subsequent hearings or site inspections. However, we would be happy to assist with further matters, if required.</i>	The Applicant notes Natural England's written representation. As noted in the signed Statement of Common Ground with Natural England [REP1-017] all issues within Natural England's remit have been successfully resolved.
REP1-038 – Julie Hay		
REP1-038a	<i>I object to the the proposals for Simister Island Interchange. We use this junction regularly going from Manchester to Burnley and back, usually returning at night. The 3 and a half year night time closure will be a nightmare for us having to use local roads we do not know. It will also cause pollution, noise, air quality issues, road safety and vibration problems for local residents. Carbon emissions will be increased by 62,013 tonnes during construction and 151,090 tonnes over the next 60 years due to increased traffic. This is in direct contrast</i>	Environmental Impact Assessment & Environmental Statement The Applicant has undertaken an environmental impact assessment (EIA) in respect of the Scheme which is set out in the Environmental Statement along with its associated 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 arising from the Scheme and the measures identified to avoid or reduce environmental effects where practicable. The Applicant, in undertaking the design of the Scheme, sought to avoid or

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	<p><i>to what what the climate emergency (declared by some boroughs in GM) says should happen. It will make it even harder for the UK to meet its legally binding climate targets, which we are already failing to meet. Traffic will be induced to use the M60 motorway to an even greater extent than is the case at present and this is an extremely busy M'way already. The scheme fits with Places for Everyone which aims to increase housing and employment but at cost to the environment, sacrificing greenbelt. This is by no means what many residents of GM, and elsewhere, want. The scheme is poor value for tax payer with a benefit to cost ration of just 1.17. National Highways have so far proposed no alternatives to road building and has proposed no non-road building alternatives eg rail to reduce demand or impact. The effect on air quality will be detrimental and NH should be seeking to reduce demand on this already overused group of motorways and junction not encourage it.</i></p>	<p>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 and REP1-025 and REP1-027]. The Applicant confirms that the Scheme will further provide environmental enhancements where possible, 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].</p> <p>Non-road building alternatives</p> <p>In response to the point concerning whether the Applicant has considered “<i>non-road building alternatives</i>”, 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 the Applicant 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.</p> <p>Construction Programme & Methodology</p> <p>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 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.</p> <p>Places for Everyone & the Greenbelt</p> <p>With regards to Places for Everyone (PfE) and the greenbelt, 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 Limits removed from the Green Belt. As the Order Limits also include 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 Limits within</p>

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		<p>the Green Belt comprises the existing motorway infrastructure.</p> <p>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 land within 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 will still be within the Green Belt.</p> <p>The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could, in policy terms, harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the land within 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 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.</p> <p>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.</p> <p>Traffic and Scheme Benefits</p> <p>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].</p> <p>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</p>

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		<p>Manchester.</p> <p>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.</p> <p>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.</p> <p>As outlined in paragraph 3.27 of the NPS NN designated in May 2024, this 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.</p> <p>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.</p> <p>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.</p> <p>Climate and Carbon</p> <p>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</p>

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		<p>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'.</p> <p>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].</p> <p>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.</p>

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REP1-039 – Massey Family		
REP1-039a	<p><i>On behalf of Adam Winthrop MRICS FAAV (acting for Messers Massey), Maybern Planning and Development Limited ('Maybern') wishes to object to the National Infrastructure Project at M60/M62/M66 Simister Island, specifically in relation to the proposed attenuation pond that has been designated for land to the south of Griffie Lane, Bury.</i></p> <p><i>The Attenuation Pond proposed lies within the south-west of Messers Massey land holding (referenced GM782300, title plan appended APPENDIX 1). National Highways sets out their intention to permanently acquire the south-western area of land under this title, as well as a temporary possession of an irregular shaped section of land in such a way that this juts into the centre of the land holding.</i></p> <p><i>Adam Winthrop MRICS FAAV wishes to be considered as an interested party in the ongoing examination, due to their clients' interest in the land proposed to be included in the Order.</i></p> <p><i>It is considered that National Highways has failed to robustly justify the proposed location for the attenuation pond proposed to the east of the M66, immediately east of the school playing fields which are located south of Griffie Lane (see Land Use Plan Sheet 4 of 5 Drawing Number HE548642-JAC-GEN-STK-DR-ZH-0006).</i></p> <p><i>The entire land holding within title referenced GM782300 is allocated for mixed use development in the recently adopted statutory development plan 'Places for Everyone' (2024). The allocation being referenced JPA1.1, Northern Gateway Heywood / Pilsworth. This follows a significant period of consultation and preparation work for the development plan document, in which the relevant land was determined appropriate for allocation to meet the future housing needs of the Borough. The proposed Order and works, both temporary and permanent, jeopardise entirely the development of land (title GM782300) in that the attenuation pond will not only lead to permanent loss of developable land but also the temporary possession will impact upon the imminent masterplanning exercise which is being carried out for the wider allocation (with neighbouring landowners).</i></p> <p><i>Were the Order to proceed in this form, compensation to the full residential value would be sought and it is clear that the level of compensation claim will be far higher than other available agricultural / unallocated / green belt land in the locality, and it is as such unclear how National Highway can justify this approach from the economic standpoint. The applicant has as such failed to demonstrate best value.</i></p> <p><i>The Inspector is requested to consider the lack of robust evidence that a full assessment of alternative locations for this attenuation pond has been</i></p>	<p>During preliminary design, 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), this included consideration of alternative pond locations and orientations. 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 more onerous long term maintenance liabilities. Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122] provides a summary of the Scheme drainage networks. Land cost, direct works cost, indirect works cost and adaptability for the infrastructure to deliver an appropriate solution to the cleansing of surface water runoff from the M66 prior to it being discharged to Castle Brook, all play an important part in the design process and fixing of detail for the DCO application. As such, the Applicant will demonstrate that there is a compelling need for this pond to be provided part way along the existing carrier pipe system in its shown location.</p> <p>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]. Rotating the pond along the southern boundary to the existing golf course would require construction of a new outfall to Castle Brook and due to the topography of the existing land, require a greater footprint for the pond than the current proposal, due to the cutting / excavation required. The existing outfall, which presently enables surface water from the M66 to reach Castle Brook, is located north east of the current pond 2, where the Order Limits abut Castle Brook. It is for this reason that the pond is orientated and located as it is, so that the pond can connect into that existing network without the need to construct a new outfall and carrier pipe system to Castle Brook from the pond.</p> <p>The Applicant notes the adoption of Places for Everyone and allocation JPA1.1. As summarised above, the Applicant has sought to reduce the scheme footprint in all areas, including within the area of the JPA1.1 allocation including the land interests of the Massey family. Prior to the start of construction, the Applicant will engage with all land interests to seek to minimise impacts during the construction phase. The construction programme for the Scheme is due to start in 2026 and last for approximately three years, however, the use of Massey family land will be for a much shorter duration within this overarching construction programme. Whilst the programme is still being developed, it is likely that the construction of Pond 2 and associated drainage infrastructure will take place over a period of months within the overall Scheme programme. Once the pond has been constructed, access may still be required at a much lower frequency for further inspections and maintenance during the remainder of the construction programme.</p> <p>The Applicant acknowledges the need for fair compensation. The Statement of Reasons [APP-018], confirms in section 6.4 that at any person affected by the exercise of compulsory acquisition powers or by the exercise of temporary possession, may be entitled to compensation. This entitlement to compensation is provided for by the existing compensation code and Articles 20, 24 to 25, 30-31, 33, 35-36. in and Schedule 6 to the draft DCO [REP1-004]. The Applicant has the resources to pay such compensation and has demonstrated in the Funding Statement [APP-019] that these resources are available.</p>

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	<p><i>undertaken. Land immediately to the south of the playing fields or land to the immediate north of the strategic allocation offer locations closer to the M62/M66 itself (thereby negating the need for easements across land to the motorway, as is proposed), and also offer the opportunity to reduce the impact on developable land. While the burden to carry out such a sequential assessment of alternative locations does not fall on my client, it is the case that the applicant here has failed to explore this to the full extent.</i></p> <p><i>My client may make further representations and may present additional evidence at a later stage accordingly.</i></p>	
REP1-040 – The Hillary Family		
REP1-040a	<p>INTRODUCTION</p> <p>1.1. 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).</p> <p>1.2. This Written Representation expands upon the Hillarys' Relevant Representation dated 5 July 2024 by enclosing full copies of the Hillarys' two written responses to the Applicant's Section 42 & Section 44 consultations.</p> <p>1.3. This Written Representation also provides an update on the preparation of the development framework for the Northern Gateway allocation within the adopted Places for Everyone Joint Development Plan.</p>	Noted.
REP1-040b	<p>SUMMARY OF REPRESENTATIONS</p> <p>2.1. The Places for Everyone Plan Joint Development Plan 2022 to 2039 (PfE) 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</p>	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, Pilsforth 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

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	<p><i>northern and eastern parts of the conurbation, increasing the economic output from this area and helping to rebalance the Greater Manchester economy.</i></p> <p><i>2.2. The Northern Gateway opportunity area 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 (see Section 4 below).</i></p> <p><i>2.3. The adopted 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, and enable training and skills 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 of delivering inclusive and sustainable growth.</i></p> <p><i>2.4. The Hillarys maintain and reiterate the following concerns in respect of the Applicant's proposed scheme insofar as it relates to the Hillary Land:</i></p> <p><i>2.4.1. 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.</i></p> <p><i>2.4.2. 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 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).</i></p> <p><i>2.4.3. As above, the Hillarys fundamentally reject any compelling need for environmental mitigation to be located on Plot 2/16b (Work 36) and/or Plot</i></p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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	<p>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).</p> <p>2.5. The Hillarys' concerns are set out more fully in their two written responses to the Applicant's Sections 42/44 consultation (see Section 3 below).</p>	
REP1-040c	<p>SECTION 42 & SECTION 44 CONSULTATION RESPONSES</p> <p>3.1. As noted in the Hillarys' Relevant Representation, enclosed with this Written Representation are full copies of the Hillarys' two written responses to the Applicant's Sections 42/44 consultation.</p> <p>3.2. The Hillarys' first Section 42(1)(d) response is enclosed at Appendix A (the First Response). The First Response in turn appended a plan showing the extent of the Hillary Land ('Appendix 1' to the S42 Response) and an indicative overlay showing the overlay between the Hillary Land and the Project's Statutory Consultation Brochure Provisional Order Limits ('Appendix 2' to the First Response).</p> <p>3.3. The Hillarys' second Section 42(1)(d) response (the Second Response) responded to the Applicant's revised consultation and specifically to the Map Book Land Use Plans v2 (July & August 2023). The Second Response is enclosed at Appendix B. The Second Response appended a revised overlay showing the overlay between the Hillary Land and the Map Book Land Use Plan ('Appendix 2' to the Second Response).</p> <p>3.4. The Hillarys request that the First Response and Second Response are read together with this Written Representation.</p>	<p>The Applicant notes and acknowledges the inclusion of the previous Section 42(1)(d) responses as part of the Written Representation which the Applicant has previously responded to.</p>
REP1-040d	<p>THE NORTHERN GATEWAY ALLOCATION</p> <p>4.1. Subsequent to the submission of the Hillarys' Relevant Representation, Bury Council has confirmed that the Hillary Land is located in the area being taken forward under the Northern Gateway adopted allocation, and that it is currently in the process of preparing a development framework. A copy of such confirmation is enclosed at Appendix C.</p>	<p>Noted.</p>

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REP1-040e	<p>SUMMARY OF THE HILLARYS' POSITION</p> <p>5.1. The Hillarys intend to rely on the Hillary Land's adopted 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 Project.</p> <p>5.2. 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 and for the attenuation pond and drain).</p> <p>5.3. 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.</p> <p>5.4. The Hillary Family therefore requests by to be heard at a Compulsory Acquisition Hearing, and has notified the Examining Authority separately as to that request.</p>	<p>The Applicant notes the summary of the Hillarys' position. Where required, the summary points listed have been responded to above.</p>
REP1-045 – Marj Powner (Chair, Friends of Carrington Moss)		
REP1-045a	<p>Summary <i>As set out in our initial Representation, the Friends of Carrington Moss object to this application. We would like to add further concerns for your review. Our Written Representation includes reference to the following topics:</i></p> <ul style="list-style-type: none"> • Context (which should be taken into account when assessing the project, all the findings of the Environmental Statement and the commentary in this written representation) • The Need for the Scheme (not proven) • Alternative Options (sustainable passenger and freight transport solutions) • Places for Everyone (which has not been fully considered) • Carbon Emissions (which is incomplete) • Article 2 of the Human Rights Act (which has not been taken into account). 	<p>The Applicant notes the objection to the DCO application.</p>
REP1-045b	<p>Context: <i>The following should be taken into account when assessing the project, all the findings of the Environmental Statement and the commentary in this written representation:</i></p> <ul style="list-style-type: none"> • All new development should be delivered in accordance with NPPF paragraph 109 (that "Significant development should be focused on locations 	<p>With respect to the first bullet point, the Applicant notes that the National Planning Policy Framework (NPPF) does not necessarily apply to Nationally Significant Infrastructure projects. Applications for DCOs are assessed against National Policy Statements, specifically in this case the National Policy Statement for National Networks (NPS NN) which the Applicant has assessed in two sets of accordance tables [APP-147 and APP-148]. The NPS NN sets out the Government's policies relating to the development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England.</p>

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	<p><i>which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes"). There is a national focus on sustainable growth, including sustainable employment locations and sustainable transport, with a significantly reduced need for travel!</i></p> <ul style="list-style-type: none"> • <i>Attaining significant modal shift is critical to the achievement of government targets, as recognised by the Climate Change Committee (CCC), which reported (2023)¹ that meeting the legally prescribed sixth national carbon budget (2033–2037) "can only be achieved if Government, regional agencies and local authorities work seamlessly together" Funding for transport initiatives should, therefore, support the achievement of the government's target.</i> • <i>It is clear from the recently published CCC report Progress in Reducing Emissions² that the country is not on track to achieve its commitment to reducing emissions in 2030 by 68% (compared to 1990 levels) and that urgent action is needed to ensure that this target is not seriously undermined.</i> • <i>In the same report³, the CCC recommended (R2023-148) that the government "Conduct a systematic review of current and future road-building projects to assess their consistency with the Government's environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation".</i> • <i>All 10 districts in Greater Manchester, and the GMCA have declared a climate emergency, and the region agreed its 2038 carbon neutral target in 2018.</i> • <i>The Greater Manchester Strategy⁴ states that the two most pressing priorities identified for the region are climate change and inequalities and highlights that Greater Manchester needs "to act quickly on decarbonisation". Sustainable passenger and freight transport should, therefore, be prioritised over road schemes which generate higher levels of carbon emissions and pollution (which disproportionately affects the most vulnerable in our society).</i> • <i>The Greater Manchester Strategy progress reports confirm that the region is currently well behind where it needs to be to achieve its ambition to be carbon neutral by 2038.</i> • <i>The Greater Manchester Transport Strategy 2040⁵ has a vision for 50% of trips to be made by sustainable modes by 2040. The document states (page 8) that "Achieving the Right Mix is expected to lead to zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040".</i> • <i>Greater Manchester has signed the Integrated Covenant of Mayors which commits each signatory to limit emissions to below 80% to 95% below 1990</i> 	<p>As regards the bullet points on climate, Section 14.1 of Chapter 14 Climate of the Environmental Statement [APP-053] sets out the potential impact of the Scheme on climate (i.e. as a result of changes in emissions of greenhouse gases (GHGs)) which was assessed in accordance with the National Highways' Design Manual for Roads and Bridges (DMRB) LA 114 Climate standard. These changes in emissions were then considered in the context of the NPS NN (Department for Transport, 2024), as set out in Section 14.3 of Chapter 14 Climate of the Environmental Statement [APP-053].</p> <p>The NPS NN (Department for Transport, 2024) states in paragraph 5.39 that "Where it provides useful context, applicants may wish to compare their scheme emissions against carbon budgets, net zero and the UK Nationally Determined Contribution. 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". As set out in Table 14.24 of Chapter 14 Climate of the Environmental Statement [APP-053], estimated greenhouse gas (GHG) emissions associated with the Scheme have been compared to UK carbon budgets (including the sixth carbon budget).</p> <p>The NPS NN further states in paragraph 5.41 that "Operational carbon emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that 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" and in paragraph 5.42 that "Any carbon assessment will include an assessment of operational carbon emissions, but the policies set out in chapter 2 of this NPS, apply to these emissions. 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".</p> <p>As required by relevant guidance (DMRB LA 114) and policy (NPS NN) therefore, the impact of the Scheme on climate has been assessed in the context of statutory UK carbon budgets. 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 identified as 'not significant'.</p> <p>The NPS NN makes clear that an increase in operational GHG emissions (i.e. from road users) is not, of itself, a reason for refusal, and that road user GHG emissions will be addressed in a managed, economy-wide manner. 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</p>

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	<p>levels, or below two metric tons per capita, by 2050. Although not legally binding, these commitments present a clear and lasting pledge to reduce emissions in the decades to come.</p> <ul style="list-style-type: none"> • Greater Manchester's 5-Year Environment Plan⁶ (5YEP) highlights (page 81) and reinforced in PfE (paragraph 5.41), along with other data highlighting the importance and urgency of addressing air pollution, that "the health and social care costs of air pollution in England could reach £5.3 billion by 2035 unless action is taken. • The 5YEP reflects (Challenge 2, page 10) that there is "strong evidence associating air pollution with increased mortality and ill health". The document confirms that "NO₂ levels in Greater Manchester are in breach of legal limits". Again, reinforced in PfE (paragraph 5.44). • The Greater Manchester Spatial Plan (Places for Everyone, PfE)⁷ confirms (paragraph 5.45) that "Greater Manchester has also signed up to achieve WHO 'Breathe Life City' status by 2030, which means achieving WHO targets for PM (PM_{2.5} must not exceed 5 µg/m³ annual mean) and other air pollutants by this date. Regardless of targets, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects. As such, policy ambitions should always be to reduce air pollution to as low as possible as further reduction of PM or NO₂ concentrations below air quality targets/standards are likely to bring additional health benefits". • Environment Act 2021⁸ introduces two new targets relating to PM_{2.5} • The principles of the Green Claims Code⁹ require that, in relation to the scheme, <ul style="list-style-type: none"> o claims must be truthful and accurate o claims must be clear and unambiguous o claims must not omit or hide important relevant information o comparisons must be fair and meaningful o claims must consider the full life cycle of the product or service o claims must be substantiated 	<p>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.</p> <p>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 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 modes was undertaken during the early development of the Scheme. Both assessments concluded that there are no alternative modes which can reasonably solve the identified problems and meet the Scheme objectives.</p> <p>Section 5.3 of Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out the legislative context used to assess air quality, including discussion of the PM_{2.5} targets and associated legislation, with the following sections explaining the methodology used in the assessment. In terms of the PM_{2.5} targets, these are discussed at paragraphs 5.3.3-5.3.5 of Chapter 5 Air Quality of the Environmental Statement [APP-044]. The interpretation of the wording of the legislation is 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 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.</p> <p>Overall, there were no significant effects, due to air quality, during operation and construction from road traffic changes. The assessment of significant effects are assessed based on the National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality) standard definitions, which are explained in Chapter 5 Air quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 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 M60 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). The risk of construction dust is considered to be 'high' in Chapter 5 Air quality of the Environmental Statement [APP-044] and therefore best practice mitigation measures have been set out in an Outline Air Quality and Dust Management Plan at Appendix A of the First Iteration Environmental Management Plan [APP-128], which include activities like 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 [REP1-004].</p> <p>The signing of the Greater Manchester authorities to the Breathelife network is a statement on the aim to improve air quality, it does not make a legal commitment to meet the World Health Organisation (WHO) guidelines (which are not legally binding) and therefore is not something that the Scheme (or any other development in the Greater Manchester area) are assessed against. Similarly, the WHO guidelines are not something that the Greater Manchester local authorities typically use for assessing their projections, schemes or projects against either.</p>

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		<p>Chapter 12: Population and Human Health of the Environmental Statement [APP-051] makes reference to the health impact of air pollution, with the scientific evidence set out in Section 4 of Appendix 12.2: Human Health Literature Review and Evidence of the Environmental Statement Appendices [APP-115]. However, the judgement of significance on population health from the Scheme considers other factors such as statutory standards and effect sizes, in addition to the scientific evidence (see response below against ref. REP1-045g).</p> <p>In the case of the assessment of the effects of air pollution associated with the Scheme, it was judged that effects on population health would only be considered significant where the Scheme would cause an exceedance of the Air Quality Objectives or where a substantial change in concentrations of pollutants are anticipated compared with the baseline. These significance criteria were not met for the Scheme, and therefore it was judged that the population health effect was not significant (see paragraphs 12.18.68 – 12.18.88 in Chapter 12: Population and Human Health of the Environmental Statement [APP-051] for the full explanation of results, and Chapter 4 of Appendix 12: Human Health Literature Review and Evidence [APP-115] for the underpinning health evidence).</p> <p>Finally, in respect of the Green Claims Code, the Applicant confirms that the code relates to the supply of products and services, and as such it does not apply to the DCO application for the Scheme.</p>
REP1-045c	<p>Need for the Scheme</p> <p><i>We do not believe the Case for the Scheme has been proven and, despite the assertion (paragraph 6.13.8) that “electric vehicles and other non-polluting fuels will reduce tail pipe emissions from vehicles”, there is increasing recognition that the only real way to reduce emissions is to reduce the amount of motor vehicle traffic on the roads. The funding for this scheme should, therefore, be redirected to more sustainable rail schemes, not expanding road capacity to encourage yet more vehicles to travel even more miles, at faster speeds.</i></p> <p><i>Furthermore, national and regional expectations require sustainable economic growth, which should mean that the need for travel is reduced, a factor that should be reflected in traffic numbers, including estimates related to future capacity. This would, in turn, mean that improvements to national connectivity (1.6.1) should, indeed, be focused on enhancements to rail transport.</i></p> <p><i>Scheme documents show a very marginal cost benefit (1.6.2), which is likely to be consumed by increasing costs. The benefits have also been overstated. Paragraph 5.3.12, for example, highlights the households who will be forecast to experience increased and reduced noise. Whilst there is an expectation that a larger number of households will benefit from reduced noise, this is based on assumptions that may not be realised. In addition, the costs associated with the smaller number of households that will experience increased noise levels may be greater due to a number of unknown and underestimated health conditions (including mental health episodes).</i></p> <p><i>Where is the evidence that road schemes result in the improved journey time reliability set out at paragraph 5.3.13 or the productivity improvements set out at paragraph 5.3.14? Extra capacity typically results in induced traffic that renders such journey time benefits unattainable and, given that there is a focus</i></p>	<p>With respect to not complying with national policy for sustainable growth, 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. The Applicant has accordingly assessed the Scheme against all versions of the NPS NN to demonstrate its overall compliance.</p> <p>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:</p> <p><i>“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.”</i></p> <p>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:</p> <p><i>“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”.</i></p> <p>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:</p>

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	<p><i>on sustainable economic development, there is an expectation that there will be reductions in the travel to work requirements. In any event, the calculations of productivity improvements in the workplace typically do not include travel to work time. If this calculation relates only to the movement of goods and/or services, this should be explicitly stated and there would be many more benefits if such movements used sustainable transport options (rail/water), particularly for long distance journeys.</i></p> <p><i>Other assumptions have been made that are unrealistically optimistic (2.1.3). The move to EVs, for example, is hampered by financial constraints (for both individuals and businesses), supply challenges and a lack of fast-charging facilities.</i></p> <p><i>We note that some of the wording in the documents is rather misleading and would not meet the tests of the Green Claims Code. Paragraph 1.5.8, for example, which states that "All wards impacted by the Scheme would benefit from improved health as a result of a reduction in the long term exposure to traffic noise" is extremely misleading.</i></p> <p><i>The word "significant" typically would be interpreted as "considerable", "major", "sizeable", "substantial". The suggestion that journey time savings of "almost 2.5 minutes in 2029 and almost 3 minutes in the 2044" (4.6.6) should be considered "significant" on a national network, which supports longer (rather than local) journeys, is absurd. The average person is unlikely to describe those time savings as significant, especially when considering the cost of the scheme and the potential benefits more sustainable initiatives could bring.</i></p> <p><i>Induced traffic is calculated to result in just "slight increases" in journey time (4.6.8) and diversions/route changes due to construction delays are "not forecast to be significant enough to result in substantial changes in travel time on these alternative routes" (4.9.1). We believe this is an unreasonable assumption, especially given the likelihood of large numbers of HGVs using alternative routes which may not be appropriate for their size and weight.</i></p> <p><i>The recent submission from the Transport Action Network to the Department for Transport Capital Spend Review¹⁰ confirms (page 8) that "It has been 30 years since the myth that road building is good for the economy and eases congestion was debunked". The submission also highlights (page 12) the Welsh Labour Government's road building tests, which assert that "All new roads in Wales need to contribute towards achieving modal shift – both to tackle climate change and to reduce congestion on the road network for freight". Should similar aims be introduced in England, this scheme would not be compliant with those tests.</i></p> <p><i>In summary, despite paragraph 6.8.24 asserting that the "most significant benefit of the Scheme is due to travel time savings", these are minimal and will not be maintained if additional traffic is induced into the area (1.3.4). There are</i></p>	<p><i>"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".</i></p> <p>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.</p> <p>The Scheme therefore 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.</p> <p>With respect to the loss of land from within the Green Belt, 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 Limits removed from the Green Belt. As the Order Limits also include 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 Limits within the Green Belt comprises the existing motorway infrastructure.</p> <p>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.</p> <p>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.</p> <p>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</p>

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	<p><i>no genuine benefits to the scheme, and the documents suggest that there would be increases in:</i></p> <ul style="list-style-type: none"> • <i>traffic (1.4.2, 4.5.2), with vehicles travelling at faster speeds (5.3.9)</i> • <i>casualties (1.4.1)</i> • <i>air, noise, light, vibration and water pollution (eg 1.5.4, 3.1.11, 5.3.11)</i> • <i>carbon emissions (5.3.9).</i> <p><i>This is not a scheme that complies with national policy for sustainable growth.</i></p> <p><i>Given that the scheme will not result in increased modal shift or support the aim to reduce motor vehicle traffic, and the need for the scheme is not proven, there are no exceptional or very special circumstances arising from this project to justify removing land from the Green Belt.</i></p>	<p>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.</p>
REP1-045d	<p>Alternative Options</p> <p><i>We cannot find any indication that sustainable alternative options have been considered. This is important because a significant number of the vehicles currently using the route are HGVs, for which national connectivity should be focused on rail and water-based transport. This scheme will just encourage the continuation of long-distance road-based haulage.</i></p> <p><i>Furthermore, diversions during construction will significantly increase air, noise, light, vibration and dust pollution on any alternative routes, causing considerable concerns, expense and health issues for residents, particularly where those alternative routes do not usually support large volumes of HGVs and other traffic.</i></p>	<p>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.</p> <p>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 the 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</p>

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		<p>into the Traffic Management Plan and secured through Requirement 10 of the draft Development Consent Order REP1-004].</p> <p>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 [REP1-010] and will be incorporated into working practices. The First Iteration Environmental Management Plan [REP1-010] 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 [REP1-010] 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.</p> <p>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].</p>
REP1-045e	<p>Places for Everyone (PfE)</p> <p><i>Despite the statement in paragraph 6.23.4, it appears that the objectives, policies and expected overall outcomes of the Greater Manchester Spatial Plan (now known as Places for Everyone, or PfE) have not been fully taken into consideration within the assessments related to this scheme, particularly in terms of the cumulative impacts of air, noise, light, vibration and water</i></p>	<p>The Applicant confirms that a cumulative effects 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 [APP-125]. The assessment has been carried out in accordance with the Inspectorate's (2019) Advice Note Seventeen: Cumulative Effects Assessment and 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</p>

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	<p><i>pollution, and, of course, carbon emissions. All these issues need further scrutiny as, given that PfE has now been adopted, planning applications associated with the proposed allocations are, to all intents and purposes, guaranteed approval (see 6.22.12).</i></p> <p><i>There has been a selective consideration of the Policies in PfE. Policy JP-S5 (Clean Air), for example, is extremely important in relation to transport schemes and includes the following criteria:</i></p> <p><i>"1. Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution</i></p> <p><i>6. Implementing the Clean Air Plan and associated measures</i></p> <p><i>11 Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users".</i></p> <p><i>The Policy is supported by Reasoned Justification that highlights (paragraph 5.40) the significant effect of air pollution on public health, that "transport is the major source of air pollution with, with roads accounting for 65% of nitrogen oxides (NOx), 79% of larger particulates (PM10) and 31% of carbon dioxide emissions across the city region" (5.46) and that "Short-term high-pollution episodes can affect health as well as long-term exposure to lower levels, so it will be important to tackle both peaks and average levels of air pollution under relevant actions" (5.51).</i></p> <p><i>In addition, in choosing to focus on a road scheme, there appears to have been no consideration of PfE Strategic Objective 6, which aims to promote the sustainable movement of people, goods and information (including improving opportunities for sustainable freight). This scheme will also not support PfE Strategic Objective 7, which aims to ensure Greater Manchester is a more resilient and carbon neutral city-region (including promoting sustainable patterns of development that minimise the need to travel and contribute to cleaner air).</i></p>	<p>other NSIPs. Part of the Northern Gateway within Rochdale Borough which already has planning permission has been included in this assessment, however, the rest of the Northern Gateway which is now allocated by PfE is not included. It is only possible to include development in the assessment of cumulative effects where a sufficient level of detail is available for this assessment to be undertaken. As no planning applications have currently been submitted on the Northern Gateway land within the administrative area of Bury Metropolitan Borough Council, a detailed assessment of cumulative effects on air, noise, light, vibration, water and carbon cannot be undertaken. Furthermore, any future planning applications submitted for the Northern Gateway allocation would be expected to undertake their own assessment of cumulative effects in combination with the Scheme.</p> <p>The Local Impact Report [REP1A-001] submitted by Bury Metropolitan Borough Council sets out, at Chapter 3, their response to the Scheme, against the policies of PfE based on the information submitted by the Applicant for the DCO application. It is acknowledged by the Applicant that its Case for the Scheme [APP-146] has not referenced all the policies identified by Bury Metropolitan Borough Council in their Local Impact Report, but conversely the Case for the Scheme has also addressed additional policies which are not referenced in the Local Impact Report. This is normal where documents are authored by different organisations and are based on planning judgements. Although the Case for Scheme [APP-146] does not specifically assess the impact against Policy JP-S5, the Local Impact Report [REP1A-001] has a section under the heading "Clean Air" and specifically references Policy JP-S5 confirming that the Air Quality chapter of the Environmental Statement [APP-044] further considers this matter. The Applicant has responded to the Local Impact Report, including Policy JP-S5, as part of its further responses to representations received after Deadline 1.</p> <p>In terms of PfE Strategic Objective 6 and Strategic Objective 7, 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 the Applicant 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.</p>
REP1-045f	<p>Carbon Emissions</p> <p><i>We believe the applicant is aware of the Greater Manchester 2038 Net Zero Carbon target, established in 2018 (despite the statement at paragraph 6.13.5 that they are "not aware of any relevant non statutory targets").</i></p> <p><i>It should be noted that the DEFRA Peat Pilot Report¹¹ (September 2020) highlights (page 6) that "Greater Manchester has set a target of net carbon neutrality by 2038. Modelling currently used by Greater Manchester Combined</i></p>	<p>The Applicant confirms that reference is made to the aim for Greater Manchester to be carbon neutral by 2038 in Table 14.5 of Chapter 14 Climate of the Environmental Statement [APP-053]. The statement in Paragraph 6.13.5 of that chapter is that "the Applicant is not aware of any <u>relevant</u> non-statutory targets", being any non-statutory targets set at a national level.</p> <p>As agreed in the Statement of Common Ground with Natural England [REP1-017] "peat is very limited with no wider peat mass within the Scheme Order Limits" and that "where possible, interaction with localised peat has been avoided". Natural England note "the evidence suggests that there are areas which have a peat depth of approximately 3 metres, however this is present under a series of made ground and clay (relating to the southern</p>

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	<p><i>Authority (GMCA) suggests that 50- 75% of peatland in the city region will need to be restored in order to achieve these targets, but this modelling may significantly underestimate the role of peat in net emissions budgets". This should be taken into consideration if the results of any geological surveys identify peat in the areas concerned.</i></p> <p><i>There also does not seem to be any allowance made for the opportunity cost of lost sequestration due to land sealing, nor for the acknowledged and expected induced traffic (including HGVs).</i></p> <p><i>The NPPF requires (157) that the planning system should (among other things) "shape places in ways that contribute to radical reductions in greenhouse gas emissions". Investing in new roads, rather than sustainable passenger and freight transport options, does not support the achievement of that criterion.</i></p> <p><i>The impact of the increased carbon emissions from the scheme has been assessed as "not significant" (6.3.16) but it will have a significant impact on the carbon emissions in the local area, including the achievement of GM's 2038 target. Furthermore, if all national road schemes make this claim, at what point does the cumulative impact of all the proposed road schemes become significant in relation to the government's target?</i></p> <p><i>It should be noted that community groups in Greater Manchester did their own calculations about the carbon implications of PfE¹² and also referred to the approach taken in the Cambridge Local Plan¹³, both of which may be useful when considering the cumulative carbon implications of development in the area of the scheme.</i></p>	<p><i>region nearest to the motorway). Whilst Natural England acknowledge this peat may be more difficult to restore, they strongly recommend it is re-used on-site, should it be extracted as part of the SUDs/pond creation". As such, measures to avoid generation of excess peat during construction and to re-use peat generated on-site in an environmentally beneficial and suitable way are included in the First Iteration Environmental Management Plan - Appendix F: Outline Soil Management Plan [REP1-014].</i></p> <p>The potential impact of longer-term changes in soil carbon and resulting GHG emissions / sequestration caused by changes in land use as a result of the Scheme (e.g. from converting arable land to developed land) have been estimated and included within the assessment, the methodology for which is described in paragraph 5.1.2 of Appendix 14.1 Estimation of Greenhouse Gas Emissions of the Environmental Statement Appendices [APP-123]. These calculations suggest there will be a slight overall increase in carbon stocks in soil and vegetation with the Scheme in place, over a 60-year appraisal period after the Scheme opening, as shown in Table 14.23 of Chapter 14 Climate of the Environmental Statement [APP-053]. This change (i.e. a net reduction in GHG emissions) is estimated to occur as a result of a slight increase in the area of 'forest land' and 'grassland' within the Order Limits, despite a decrease in the area of 'cropland' and an increase in the area of 'developed' land.</p> <p>Whilst the Scheme is estimated to result in an increase in operational road user GHG emissions, Paragraph 5.41 of the National Policy Statement for National Networks (NPS NN) (Department for Transport, 2024) (NPS NN) states 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". There is therefore no expectation that Nationally Significant Infrastructure Projects which form part of the National Network should in and of themselves result in a reduction in GHG emissions.</p> <p>An assessment of the net change in GHG emissions associated with the Scheme against UK Government carbon budgets has been undertaken in accordance with Paragraph 3.18 of the Design Manual for Roads and Bridges (DMRB) LA 114 Climate standard and as suggested by Paragraph 5.39 of the NPS NN. Potential cumulative effects are discussed in Paragraphs 14.10.14 to 14.10.19 of Chapter 14 Climate of the Environmental Statement [APP-053]. No separate cumulative assessment has been undertaken for GHG emissions on the basis that the assessment undertaken is inherently cumulative, as changes in GHG emissions have been considered in the context of national carbon budgets. This approach is supported by a recent judgment in the Court of Appeal (R (on the application of Andrew Boswell) v Secretary of State for Transport and National Highways, [2024] EWHC 1572 (Admin); [2024] EWCA Civ 145; and [2024] 5 WLUK 624), which concluded that there is no meaningful way to carry out a wider assessment of cumulative emissions in the context of current scientific knowledge and the lack of any geographical boundary for such emissions "as there is no basis for selecting any particular... cumulative project that has GHG emissions over any other".</p> <p>Institute of Environmental Management and Assessment (IEMA) guidance on 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (IEMA, 2022) indicates in Table 1 that "Local or regional carbon budgets developed by local authorities and researchers (e.g. the Tyndall Centre at the University of Manchester)" can be used to provide contextual information against which projects can be evaluated. However, it also notes in Table 1 that whilst this is potentially a "more pertinent scale for individual projects and local decision-making", there are several limitations with such an approach including "Effects of GHG emissions are not geographically circumscribed, so a geographic budget (below a national budget defined based on negotiated NDCs to commitments to a global budget agreed through the UNFCCC) is not very meaningful" and "It's unclear whether emerging local authority or regional budgets will add up coherently to the UK budget". As noted above, as required by relevant guidance (DMRB LA 114) and policy (NPS NN), the impact of the Scheme on climate has been assessed in the context of statutory UK carbon budgets. The approach taken in assessing GHG emissions against UK carbon budgets is also consistent</p>

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		<p>with recent case law (R (GOESA Ltd) v Eastleigh Borough Council [2022] EWHC 1221 (Admin), Holgate J at 123). As per the 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 a Scheme like the M60 junction 18 is required to resolve the identified traffic related problems.</p> <p>The modelling of the Scheme traffic model is based on Department for Transport guidance, only includes development sites that are 'Near Certain' and 'More Than Likely'. In areas where there are no future planned developments, background traffic growth predictions provided by the DfT have been used. The modelling excludes development sites where the classification is either 'Reasonably Foreseeable' (i.e., the outcome may happen) or 'Hypothetical' (i.e., there is considerable uncertainty whether the outcome will ever happen). The Transport Assessment (APP-149), Paragraphs 2.6.12 to 2.6.16 present details of the local employment and residential developments as well as the highway infrastructure schemes that have been included in the modelling of the Scheme.</p>
REP1-045g	<p>Article 2, Human Rights Act</p> <p><i>We welcome the Planning Inspectors' inclusion of Air Quality in the list of Principal Issues (Rule 6 letter) and believe that the examination should include reference to the increasing evidence of the health impact of air pollution.</i></p> <p><i>We note that paragraph 6.2.1 of the Statement of Reasons mentions Articles 1, 6 and 8 of the Human Rights Act (HRA) but does not include reference to Article 2¹⁴. This Article states that "Public authorities should also consider your right to life when making decisions that might put you in danger or that affect your life expectancy". For those who are already susceptible to the impact of air pollution, the increases expected as a consequence of this scheme could significantly affect their life expectancy, particularly for vulnerable children and adults, including those with relevant protected characteristics.</i></p> <p><i>Data from the Air Quality Life Index¹⁵, for example, makes it clear that particulate pollution is the greatest external risk to human health. Its impact on life expectancy is comparable to that of smoking, more than 4 times that of high alcohol use, more than 5 times that of transport injuries like car crashes, and more than 6 times that of HIV/AIDS.</i></p> <p><i>The AQLI's latest data reveals that "permanently reducing global PM_{2.5} air</i></p>	<p>Section 4 of Appendix 12.2: Human Health Literature Review and Evidence of the Environmental Statement Appendices [APP-115] presents recent scientific evidence of the health impacts of air pollution. This evidence has been used to help inform the judgements of significance provided in Section 12.18 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. The interpretation of the scientific evidence for the health impact of air pollution for the context of the Scheme is set out in Section 4.5 of Appendix 12: Human Health Literature Review and Evidence of the Environmental Statement Appendices [APP-115]. The interpretation notes the good evidence that transport related air pollutants is associated with a range of health outcomes. It interprets the evidence that any increase in exposure to air pollution is negative for population health, while any decrease in exposure is positive for population health. However, in accordance with the Institute for Environmental Management and Assessment (IEMA) Guide to Determining Significance for Human Health in Environmental Impact Assessment (Pyper et al., 2022) the judgement of significance in terms of population health effects for the context of EIA is based on several considerations. This includes the scientific evidence together with other considerations such as effect sizes and statutory standards (see Table 12.27 in Chapter 12: Population and Human Health of the Environmental Statement [APP-051] for the significance criteria). In the case of the assessment of the effects of air pollution associated with the Scheme, it was judged that effects on population health would only be considered significant where the Scheme would cause an exceedance of the Air Quality Objectives or where a substantial change in concentrations of pollutants are anticipated compared with the baseline. These significance criteria were not met for the Scheme, and therefore it was judged that the health effect was not significant (see paragraphs 12.18.68 – 12.18.88 in Chapter 12: Population and Human Health of the Environmental Statement [APP-051] for the full explanation of results, and Chapter 4 of Appendix 12: Human Health Literature Review and Evidence of the Environmental Statement Appendices [APP-115] for the underpinning health evidence).</p>

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	<p><i>pollution to meet the World Health Organization (WHO) guideline would add 1.9 years onto average human life expectancy”.</i></p> <p><i>Simister is one of the places that already experiences illegal levels of pollution and there is no evidence that approval of this scheme will comply with Article 2 of the HRA, paragraphs 109, 180 or 192 of the NPPF or the targets set out in the Environment Act 2021. In addition, whilst the Greater Manchester Clean Air Plan has been on a roller-coaster ride for several years, there is no evidence that this scheme will enable local boroughs to comply with the requirements of that Clean Air Plan when it is published.</i></p> <p><i>Despite the references in the report to the identified exceedances of pollutants (paragraph 6.14.21 for example), there are expected to be no significant effects from either dust (paragraph 6.14.22) or air quality (paragraph 6.14.23). Given the anticipated increases in traffic and the associated air pollution, this assessment is, at the very least, questionable.</i></p> <p><i>In considering the impact on human and wildlife health, it is shameful that the new PM_{2.5}2040 targets (and the interim targets) are judged not to apply to schemes such as this (paragraph 5.3.5, APP-044). The Environment Act target legislation¹⁶, however, provides for the Secretary of State to (12.3.a) “establish new monitoring stations to measure PM_{2.5} levels for the purposes of these Regulations”.</i></p> <p><i>Whether or not this scheme goes ahead, a request will be made for at least one such monitoring station to be secured. PM_{2.5} levels will, therefore, need to meet the requirements of the Act. Not comprehensively measuring and monitoring air pollution in an area with such high traffic levels is a total betrayal of current and future generations and the inadequacy of the number of monitoring stations, or the differences between national and local compliance with Limit Values (paragraph 5.3.14, 5.3.15, Table 5.5), should not be used as a reason to abdicate responsibility for the health of local populations (humans or wildlife) and users of the motorway.</i></p>	<p>Section 5.3 of Chapter 5 Air Quality of the Environmental Statement [APP-044] sets out the legislative context used to assess air quality, including discussion of the PM_{2.5} targets and associated legislation, with the following sections explaining the methodology used in the assessment. In terms of the PM_{2.5} targets, these are discussed in paragraphs 5.3.3-5.3.5 of Chapter 5 Air Quality of the Environmental Statement [APP-044]. The interpretation of the wording of the legislation is 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 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. Overall, there were no significant effects, due to air quality, during operation and construction from road traffic changes. The assessment of significant effects are assessed based on the National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality) standard definitions, which are explained in Chapter 5 Air quality of the Environmental Statement [APP-044]. Closer to the Scheme, between M60 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 M60 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). The risk of construction dust is considered to be 'high' in Chapter 5 Air Quality of the Environmental Statement [APP-044] and therefore best practice mitigation measures have been set out in an Outline Air Quality and Dust Management Plan at Appendix A of the First Iteration Environmental Management Plan [APP-128], which include activities like 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 [REP1-004].</p>
REP1-045h	<p>Summary <i>As set out in our initial Representation, the Friends of Carrington Moss object to this application. We would like to add further concerns for your review. Our Written Representation (attached) includes reference to the following topics:</i></p> <ul style="list-style-type: none"> • <i>Context (which should be taken into account when assessing the project, all the findings of the Environmental Statement and the commentary in this written representation)</i> • <i>The Need for the Scheme (not proven)</i> • <i>Alternative Options (sustainable passenger and freight transport solutions)</i> • <i>Places for Everyone (which has not been fully considered)</i> • <i>Carbon Emissions (which is incomplete)</i> 	<p>Please refer to the Applicant's responses to references REP1-045a-g.</p>

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	<ul style="list-style-type: none"> Article 2 of the Human Rights Act (which has not been taken into account). 	
REP1-048 – Simister Village Community Association		
REP1-048a	<p><i>The proposed scheme at Simister Island Interchange does not take into account the Places for Everyone (PfE) development of 1.2 square m of industrial space and 1550 houses that has recently been granted in the local area. There has been no consideration of how much this development will affect the local area and the knock on effect towards the proposed scheme. The modelling for the scheme has only considered what is currently in place and doesn't mitigate any future developments. The development has already been agreed and should be included in any decisions for this scheme.</i></p> <p><i>Residents that travel on the motorways on a regular basis have already feedback to National Highways this is not where the issue lies, it is at M60 Worsley where traffic regularly bottlenecks. The scheme will further impact local residents as construction will take place at night over a three and half year period, causing unacceptable noise and disturbance. Night time motorway closures will transfer more traffic onto the local road network, increasing noise and disturbance. Simister and Bowlee currently have illegal air quality readings due to the motorways (M60, M62 and M66) surrounding the scheme. Through a Freedom of Information request Highways England provided the readings on the Strategic Road Networks around Simister and Bowlee in 2015/2016 were:</i></p> <p><i>75% at illegal limit 15% at legal limit 10% not full year readings</i></p> <p><i>With the introduction of Places for Everyone with 1.2 million square metres of industrial and 1550 homes this will undoubtedly increase already illegal levels of carbon emissions even further. Point 17 Page 233 of the PfE states we will "incorporate appropriate noise and air quality mitigation measures and high-quality landscaping along the M60 motorway corridors and local road network if required within the allocation." These measures will definitely be required due to the already illegal levels. However, National Highways have already tried this through the Barrier erecting study and it failed. The before and after results were provided and it was confirmed there was no reduction in pollution. Therefore, what will the noise and air quality mitigation measures consist of? There should have been a detailed plan developed before this scheme was considered.</i></p> <p><i>Even Bury Council are concerned by the scheme as they responded to the Preliminary Environmental Information Report (page 60) that they are "concerned about the potential impacts on air quality and how these can be mitigated". They highlight that "The junction as it is now is likely to be contributing to high nitrogen dioxide levels on A 56 and at the side of</i></p>	<p>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 PfE can be found in Chapter 6 of the Case for the Scheme [APP-146].</p> <p>The Scheme has 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.</p> <p>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]. The assessment has been carried out in accordance with the Planning Inspectorate's (2019) Advice Note Seventeen: Cumulative Effects Assessment and 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 Limits where construction of the Northern Loop will take place. This overlap has been discussed with Bury Metropolitan Borough Council including representatives from the planning, legal, highways and land and property departments. These discussions have established that 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 the subject of 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.</p> <p>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</p>

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	<p><i>M60 between J17 and J18. Monitoring of nitrogen dioxide emissions close to residential housing at the side of the M60 between Junction 17 and 18 indicate that objectives for nitrogen dioxide were not met in 2019". They continue, in relation to the proposals that the "prospect of having 10 lanes of running traffic closer to the above residential properties is of great concern, as would be the impact on air quality for residents of Simister. The Environment Team suggests that Highways England must ensure that any improvements at Junction 17 and 18 have a positive impact on air quality and reduce nitrogen dioxide at nearby properties. The Environment Team will need to see the detailed air quality modelling carried out for the schemes and associated reports. It will need assurances that the project will not undermine proposals in the Greater Manchester Clean Air Plan to meet nitrogen dioxide objectives in the shortest time possible."</i></p> <p><i>National Highways, Bury Council and GMCA must work together to mitigate the effect of both this scheme and PfE to ensure the health and well being of local residents including young people at the two current schools a few hundred metres away from the scheme and the proposed school due to be built as part of the PfE. The public services involved in these developments have a duty of care as this will increase health inequalities and affect local people's health and well being.</i></p>	<p>the future</p> <p>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 permission.</p> <p>With respect to references to Bury Metropolitan Borough Council's concerns about air quality, the Applicant notes that the Local Impact Report [REP1A-001] has set out the response to the Scheme by Bury Metropolitan Borough Council, including an assessment against the policies of PfE. This includes specific comments on PfE policies relating to air quality. This is the most recent statement by Bury Metropolitan Borough Council on these matters. The Applicant has responded to the Local Impact Report as part of its further responses to representations received following Deadline 1.</p> <p>The Applicant further notes that 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 assessment is based on National Highways' Design Manual for Roads and Bridges LA 105 (Air quality) standard, which is explained in Chapter 5 Air Quality of the Environmental Statement APP-044]. The methodology takes into account the replacement of older vehicles with newer vehicles, that are less polluting, in line with national projections, which results in lower concentrations in future years. Past monitoring data from 2015 to 2021 is presented in Table 1.5 in Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079]. Base year (2018) modelled concentrations, discussed in paragraphs 5.7.23-25 and 5.7.32-34 of Chapter 5 Air Quality of the Environmental Statement [APP-044], in line with monitored data, show air quality exceedances of the annual average nitrogen dioxide (NO₂) air quality objectives and limit values close to the motorway network. However, by the modelled construction year and opening year the NO₂ modelled results, discussed in section 5.10 of Chapter 5 Air Quality of the Environmental Statement [APP-044], are either below the relevant limit values and air quality objectives 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 legal limits or objectives. Closer to the Scheme, between M60 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 M60 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).</p> <p>As regards noise impacts, 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 [REP1-010]). The assessment indicates an overall reduction in road traffic noise of between 1 and 5 dB(A) at residential dwellings adjacent to the M60 between junctions 17 and J18, 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.</p> <p>Measures to reduce the noise from construction activities are included in the First Iteration Environmental Management Plan [REP1-010] and will be incorporated into working practices. The First Iteration Environmental</p>

Written Representations		
Reference	Comment	Applicant's Response
		<p>Management Plan [REP1-010] includes a Noise and Vibration Management Plan at Appendix B [APP-129] which details the management and monitoring processes to be introduced across all construction sites and compounds. The Register of Environmental Actions and Commitments, contained within the First Iteration Environmental Management Plan [REP1-010] 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.</p>

3. Applicant Responses to ISH1 Actions

3.1.1. Table 3-1 below documents the Applicant's responses to the comments provided by both the Environment Agency and Bury Council at Deadline 1, in response to actions raised by the ExA as part of Issue Specific Hearing 1 held on 12th September 2024. Where necessary, comments by both the Environment Agency and Bury Council pertain to action points raised by the ExA contained within *Applicant's Response to the Issue Specific Hearing 1 Supplementary Agenda* [REP1-023] and *Written submissions following September hearings and responses to Action Points from ISH1* [REP1-024].

Table 3-1 – ISH 1 Responses

Applicant Responses to ISH1 Actions					
REP1-031 – Environment Agency					
Action Number	Subject	Response By	Questions / Clarification	Environment Agency Response	Applicant Response
ISH1. A.34	Drafting	1. Applicant 2. Environment Agency and Bury Council	<p>Article 18(5) – Discharge of water</p> <p>1. Paragraph 5 refers to 'main river' although no definition is provided as to what this includes. Should the following definition highlighted in bold be added to paragraph (8) after sub-paragraph (b) to improve precision: “main river” means watercourses as defined under section 113(1) of the Water Resources Act 1991 and shown as such on the statutory main river maps held by the Environment Agency and the Department for Environment, Food and Rural Affairs.? If so, please amend accordingly or explain why this is not necessary.</p> <p>2. Can the Environment Agency and Bury Council provide any comments on this suggestion?</p>	We concur with the ExA recommendation and have no further comments.	The Applicant confirms that the proposed amendment was made to the draft Development Consent Order [REP1-004] submitted at Deadline 1.
REP1-032 – Bury Council					
1. Issue Specific Hearing 1 (ISH1) – Supplementary Agenda Additional Questions					
Action Number	Subject	Questions / Clarification		Bury Council Response	Applicant Response
ISH1.A.19	Article 11(3) – Application of the 1991 Act	Paragraph (3) seeks to disapply several sections of the New Roads and Street Works Act 1991, as amended by the Traffic Management Act 2004. Please clarify if you are satisfied that these sections can be disapplied and if not, why not?		Satisfied that the sections can be disapplied.	The Applicant notes Bury Metropolitan Borough Council's comment.
ISH1.A.23	Article 13(4)(b) –	Do Bury Council consider it necessary for paragraph 4(b) to be		Agree the suggested amendment.	The Applicant notes Bury Metropolitan Borough Council's

Applicant Responses to ISH1 Actions				
	<i>Classification of roads etc.</i>	expanded by specifying that any agreement should be made in writing by the local highway authority? If so, please explain why and if not, explain why not.		comment and has no objection to inclusion of the wording 'in writing'.
ISH1.A.26	<i>Article 14(6) – Temporary closure and restriction of use of streets</i>	Is the 28 day period specified for issuing a decision of an application for consent a sufficient period of time? If not, explain why not and what you consider an appropriate period of time for issuing a decision would be.	Agree that 28 days is sufficient.	The Applicant notes Bury Metropolitan Borough Council's comment.
ISH1.A.34	<i>Article 18(5) – Discharge of water</i>	<p>1. Paragraph 5 refers to 'main river' although no definition is provided as to what this includes. Should the following definition highlighted in bold be added to paragraph (8) after sub-paragraph (b) to improve precision: "main river" means watercourses as defined under section 113(1) of the Water Resources Act 1991 and shown as such on the statutory main river maps held by the Environment Agency and the Department for Environment, Food and Rural Affairs.?'</p> <p>2. Can the Environment Agency and Bury Council provide any comments on this suggestion (as set out at (1))?</p>	Considered to be an acceptable definition.	The Applicant confirms that the proposed amendment was made to the draft Development Consent Order [REP1-004] submitted at Deadline 1.
ISH1.A.36	<i>Article 18(9) – Discharge of water</i>	Is the 28 day period specified for issuing a decision of an application for consent a sufficient period of time? If not, explain why not and what you consider an appropriate period of time for issuing a decision would be.	Agree that 28 days is sufficient.	The Applicant notes Bury Metropolitan Borough Council's comment.
ISH1.A.71	<i>Article 14(6), Article 17(11), Article 20(6)</i>	Is the 28 day period stipulated for determination of an application for consent under these paragraphs a sufficient period of time? If not, why not and what would be an appropriate determination period?	Agree that 28 days is sufficient.	The Applicant notes Bury Metropolitan Borough Council's comment.
ISH1.S2.10	<i>Requirement 5(4) – Landscaping</i>	<p>1. As diverted Public Rights of Way and maintenance tracks are proposed and potentially boundary treatment, does an additional criterion need to be added requiring details of hard landscaping and materials including colour, boundary treatment of any fences and walls, structures and street furniture?</p> <p>2. In criterion (c), does reference need to be made for the scheme to be in accordance with the Arboricultural Impact Assessment [APP-086]?</p> <p>3. Landscaping can often require significant earthworks and changes to levels. Therefore, should the list in criterion (d) be expanded to incorporate details to show this, such as (but not limited to) details of changes to existing land levels, gradients for areas of permanent earthworks (such as sides of northern loop), and/or cross sections to illustrate slope profiles where embankments are formed?</p> <p>4. Should criterion (e) be reworded and expanded to include reference to 'maintenance' ie 'timetables for the</p>	<p>1. Agree that an additional criterion should be added.</p> <p>2. Would not object to its inclusion.</p> <p>3. Agree to the expansion of criterion (d).</p> <p>4. Agree to the suggestion in relation to criterion (e).</p>	<p>1. The Applicant confirms that Requirement 5 deals only with landscaping. Works to Public Rights of Way and maintenance tracks are beyond the scope of the landscaping scheme.</p> <p>2. The Arboricultural Impact Assessment [APP-086] identifies the trees affected by the Scheme rather than the protection measures required. Tree protection measures will instead be approved as part of the landscaping scheme.</p> <p>3. The Applicant does not consider this addition necessary in the circumstances where the application is already accompanied by engineering section drawings and Requirement 5(4)(d) requires details of the proposed finished ground levels to be submitted to and approved by the Secretary of State in consultation with the relevant planning authority.</p> <p>4. The landscaping scheme relates only to the detail of the landscaping proposed / required and thereafter its completion. It does not deal with maintenance.</p>

Applicant Responses to ISH1 Actions				
		implementation and maintenance for all landscaping works'?		
ISH1.S2.12	<i>Requirement 5(6) – Landscaping</i>	Are parties satisfied with the 5 year period specified? If not, what would a sufficient period of time be and why?	Would agree that 5 years is sufficient.	The Applicant notes Bury Metropolitan Borough Council's comment.
ISH1.S2.13	<i>Requirement 5 – Landscaping</i>	Does an additional sub-paragraph need to be added requiring the authorised development being operated and maintained in accordance with the Third Iteration EMP to ensure that the contents of paragraphs N.1.5 and N.6.3 of Appendix N Outline Landscape and Ecology Management Plan of the First Iteration EMP [APP-141] would be secured? If not, why not?	Agree to the suggestion.	The Applicant confirms that this is not required as it is already secured in Requirement 4(8).
ISH1.S2.15	<i>Requirement 7 – Protected species</i>	<p>1. Paragraph N.3.8 of Appendix N Outline Landscape and Ecology Management Plan of the First Iteration EMP [APP-141] states that preconstruction surveys for protected species are required by R7 of the dDCO yet the wording of R7 does not include this. Should an additional paragraph be added at the beginning of the requirement to secure this? If not, explain why not.</p> <p>2. If a paragraph is inserted to incorporate the above, should the wording in sub-paragraph (1) be expanded to include the following: 'In the event that the pre-construction survey prepared under subparagraph (1) identified the presence of protected species, or any protected species which were not previously identified in the environmental statement...'</p>	<p>1. Agree to the suggestion.</p> <p>2. Agree to the suggestion.</p>	<p>1. The need for pre-construction surveys is identified and secured by commitments B11 and B12 in the Register of Environmental Actions and Commitments at Table 3.2 of the First Iteration Environmental Management Plan [APP-127]. These commitments will be carried forward into the Landscape and Ecology Management Plan which forms part of the Second Iteration Environmental Management Plan required to approved before commencement of the authorised development. As such, the Applicant does not see the need to duplicate the commitment in Requirement 7.</p> <p>2. See above.</p>
ISH1.S2.16	<i>Requirement 7(2) – Protected species</i>	2. Do Bury Council also wish to be consulted on the written scheme of protection and mitigation measures? If so, explain why.	<p>It is considered that the Council is copied in to any consultation with Natural England on species mitigation protection.</p> <p>Whilst accepting that Natural England are the consultee and have the final say, it is important for the Council to know where mitigation is proposed, particularly where off-site, as is noted for Barn owl. The main reason is:</p> <ul style="list-style-type: none"> The adjacent land is allocated for development in the Places for Everyone (PfE) Joint Development Plan Document. It is important for the Council to be aware where mitigation is proposed, as first it may be located in such a place that it will be difficult to avoid when and if development occurs and second, if avoidable, the Council would need to know where it has occurred to prevent accidental damage 	The Applicant confirms that the proposed amendment was made to the draft Development Consent Order [REP1-004] submitted at Deadline 1.

Applicant Responses to ISH1 Actions				
			during development. <ul style="list-style-type: none"> • Secondly, for certain species the Council would want to avoid duplication of effort when and if the PfE allocation came forward. Whilst some species are colonial and therefore the more suitable habitat available the higher the population, for others that are territorial, additional breeding opportunities would be unlikely to succeed. 	
ISH1.S2.24	<i>Requirement 12(1) – Application made under requirements</i>	As currently drafted this requirement would give deemed approval for the discharge of any application, subject to a number of caveats, if no decision is made by the Secretary of State within 8 weeks from submission of those details. Is this time period appropriate? If not, please advise what an appropriate time period would be and why.	Agree that the 8 week time period is appropriate.	The Applicant notes Bury Metropolitan Borough Council's comment.
2. Issue Specific Hearing 1 (ISH1) – Action Points arising				
Action Number	Subject	Questions / Clarification Bury Council Response	Applicant Response	
Action 5	<i>Provide detail of the permissions / notifications being sought under Article 10 and the provisions under Article 11(5).</i>	The Council requires advance notice of works within the streets for which it is responsible (as the Street Authority) so that it is able to coordinate works. Article 10(3) confirms that relevant sections of New Roads and Street Works Act (NRSWA) 1991 still apply and this includes the need to give advance notice (Section 54) and notice of the start date for works (Section 55). The Council is therefore satisfied with the requirements of Article 10(3) and agrees with the provisions of the NRSWA 1991 that are disapplied by Article 11(3).	The Applicant notes Bury Metropolitan Borough Council's comment.	
Action 23	<i>Agree with Bury Council what the method of agreement would be under Requirement 4(c)(xiii) and whether it can be more accurately defined in the drafting.</i>	The Council and the Applicant have agreed that the draft DCO will be revised to include the wording "in advance in writing". The Council and the Applicant will communicate during the works period to agree the method to be used e.g. by email.	The Applicant notes Bury Metropolitan Borough Council's comment. The Applicant confirms that the proposed amendment was made to the draft Development Consent Order [REP1-004] submitted at Deadline 1.	

4. Applicant Responses to Written submissions of oral submissions from OFH1

4.1.1. Table 4-1 below documents the Applicant's responses to the written submissions of oral submissions provided by attendees at Open Floor Hearing 1 on 11th September 2024.

Table 4-1 - Applicant Responses to Written submissions of oral submissions from OFH1

Applicant Responses to Written submissions of oral submissions from OFH1		
Reference	Comment	Applicant's Response
REP1-044 – Theresa Dolan		
REP1-044a	<p>Notes for Open Floor Hearing 1 – Wednesday 11th September 2024.</p> <p>A Plea for Wildlife Preservation: Opposing the Motorway Expansion between junction 17 and junction 18.</p> <p><i>The proposed expansion of the motorway between junction 17 and junction 18 adjacent to our property on Warwick Avenue presents a grave threat to the delicate ecosystems that have evolved within the surrounding environment. The plan to widen the carriageway by adding a fifth lane in both directions, accompanied by a reduction in the embankment size and the removal or reduction of trees and shrubs, will have a devastating impact on the protected species that call this area home: bats and hedgehogs.</i></p> <p><i>Bats, nocturnal creatures that play a vital role in pest control and pollination, rely heavily on trees and shrubs for roosting and foraging. The loss of these habitats will significantly disrupt their daily lives, leading to reduced food availability, increased competition for limited resources, and potential disturbances to breeding colonies. Moreover, the construction process itself may disturb roosting bats, causing them to abandon their young or experience stress-related health issues.</i></p> <p><i>Hedgehogs, another protected species, are also at risk from the proposed expansion. These solitary creatures rely on a diverse range of habitats, including hedgerows, scrubland, and grasslands, for foraging, breeding, and shelter. The reduction in the embankment size and the removal of trees and shrubs will diminish the availability of these critical habitats, leaving hedgehogs vulnerable to predation, habitat fragmentation, and road traffic accidents.</i></p> <p><i>The European Protected Species Wildlife and Countryside Act of 1981 provides legal protection to both bats and hedgehogs, recognizing their importance to the ecosystem and the need to conserve their populations. The proposed expansion of the motorway would directly contravene the provisions of this act, as it would result in the destruction and disturbance of the habitats of these protected species.</i></p> <p><i>I implore the planning inspectors to carefully consider the potential consequences of the proposed motorway expansion on bats and hedgehogs who live on the embankment of the motorway. The loss of these species would have a significant negative impact on the biodiversity of the area and could</i></p>	<p>The Applicant confirms that Chapter 8 Biodiversity of the Environmental Statement [REP1-025] provides an assessment of the effects on wildlife and the habitats they rely upon due to the construction and operation of the Scheme. This includes the impacts of habitat loss including the removal or reduction of trees and shrubs to enable construction of the Scheme. Habitat loss is assessed both in terms of the impacts on the individual habitats (Paragraphs 8.10.60 to 8.10.99), and in terms of effects on individual species, including bats (Paragraphs 8.10.103 to 8.10.111) and hedgehogs (Paragraph 8.10.176).</p> <p>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]. Bats are legally protected by UK legislation (Wildlife and Countryside Act 1981 as amended) and European legislation (Conservation of Habitats and Species Regulations 2017 as amended). Surveys undertaken 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 the 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. Although desktop surveys identified bats roosts within 2km of the provisional Order Limits (the proposed Order Limits at an earlier stage in the design), field surveys did not identify any roosts within 100m of the Order Limits. Static surveys recorded four bat species within the survey area with the greatest level of bat activity was recorded in Philips Park Local Nature Reserve to the west of the Scheme, but this is beyond the zone of influence (the area over which a receptor may receive impacts from the Scheme) for impacts on bats. Bat activity recorded during transect surveys was largely associated with bats foraging along hedgerows, with occasional activity over open grassland areas. Surveys of the hedgerows along Egypt Lane show they appear to be used by the local bat population, but not on a consistent basis for commuting reasons, and by only a small number of bats. This data was used to inform an assessment of the impacts of construction and operation of the Scheme, including mortality during construction, loss of roosting habitat, loss of foraging habitat, habitat fragmentation, disturbance from noise, vibration and lighting, mortality during operation of the Scheme, disturbance from operational noise, fragmentation from lighting, and prey availability. 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.</p> <p>Hedgehogs are a priority species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The NERC Act places a duty on public authorities in England to conserve biodiversity. This requires public bodies and statutory undertakers to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions (Section 40 of NERC Act). The NERC Act also places a duty on the Secretary of State to maintain lists of species and habitats which are regarded as being of principal importance for the conservation of biodiversity in England (Section 41 of the NERC Act), i.e. Priority habitats and Priority species. For clarity, hedgehogs are not protected by European legislation or the Wildlife and Countryside Act 1981. As outlined in Paragraph 8.6.2 of Chapter 8 Biodiversity of the Environmental Statement [REP1-025], records for protected and notable species 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 [REP1-025], hedgehog were recorded incidentally within habitats to the north-east and north-west of the Scheme in low numbers. Grassland, arable fields and</p>

Applicant Responses to Written submissions of oral submissions from OFH1		
Reference	Comment	Applicant's Response
	<p><i>have long-term ecological consequences. I urge the inspectors to reject the expansion plan and to explore alternative solutions that prioritize the preservation of wildlife and the protection of our natural heritage.</i></p> <p><i>In conclusion, the proposed expansion of the motorway poses a serious threat to the survival of bats and hedgehogs in the local area. By taking into account the provisions of the European Protected Species Wildlife and Countryside Act of 1981, the planning inspectors can help to ensure that the expansion does not proceed at the expense of these valuable species. I urge the inspectors to reject the proposed plan and to seek alternative solutions that prioritize the conservation of wildlife and the protection of our environment.</i></p> <p><i>Thank you</i></p> <p><i>Theresa Dolan</i></p> <p><i>Also speaking on behalf of Tracy Candlin residing at the same address on Warwick Avenue.</i></p>	<p>hedgerow habitats within and around the Scheme are likely to be used by 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 [REP1-025] provide the assessment of construction and operation impacts on priority species, including hedgehog. Impacts considered include direct mortality duration construction, loss of habitat, disturbance from noise, vibration and lighting, habitat fragmentation, and mortality due to operation of the Scheme.</p> <p>Mitigation measures are detailed within Section 8.9 of Chapter 8 Biodiversity of the Environmental Statement [REP1-025]. Measures of relevance to mitigate the impacts to wildlife arising from loss of habitat include:</p> <ul style="list-style-type: none"> • Collaboration with the infrastructure design team to avoid or reduce environmental impacts through the Scheme design. • Minimising the clearance of existing vegetation within the temporary works areas as far as practicable. Particular attention will be given to the retention of mature vegetation including individual trees, linear tree belts and woodlands. • New habitat creation, in accordance with Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-057], • Connectivity of habitats will be maximised through provision of new hedgerow planting. <p>The assessment concludes that, with mitigation measures, there would be no significant (i.e. moderate, large or very large) adverse effects on bats or hedgehogs (or on any biodiversity receptor) due to construction and operation of the Scheme. Mitigation measures, including those mentioned above, are included and secured in the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [REP1-010] which will be developed into the Second Iteration Environmental Management Plan and secured through Requirement 4 of the draft Development Consent Order [REP1-004].</p>
REP1-046 – Mark Thomas		
REP1-046a	<p><i>Hello Melissa,</i></p> <p><i>Firstly, thank you for allowing me to speak this afternoon at the above meeting.</i></p> <p><i>My main points of concern and consideration are as follows:-</i></p> <ul style="list-style-type: none"> • <i>I am challenging the decision of the project around the Simister Island Junction area. As a local resident we travel the M60/M62/M66 motorways daily and see at first hand the impact of the volume of traffic. Clearly this has to be improved for all parties. For myself there is greater concern of the traffic volumes and congestion at the Worsley Junction (Junction 15) more than the Sinister Junction. Surely this Junction needs the necessary changes and not the Sinister Junction?</i> • <i>Also from our home we do experience a lot of traffic noise pollution from the Motorways and our major concern is that the increase to 5 lanes on both sides will have an exponential increase in noise and pollution?</i> • <i>Is this proposed project part of other future plans to improve the local</i> 	<p>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 commitment, improvements to other areas of the M60, such as the Swinton/Worsley junction, are not within the scope of the Scheme.</p> <p>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 [REP1-010]). The assessment indicates an overall reduction in road traffic noise of between 1 and 5 decibels (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</p>

Applicant Responses to Written submissions of oral submissions from OFH1		
Reference	Comment	Applicant's Response
	<p><i>motorway network or a stand alone project?</i></p> <ul style="list-style-type: none"> • <i>Should this project go a head, I'm concerned on the impact it will have on local arterial roads and cause huge traffic issues and grid lock.</i> • <i>As one of the other speaks pointed out today about the impact on localised animals, we are also aware that crested newts are quite prevalent in the local area and these to are a protected species.</i> <p><i>i would ask that all concerns raised are evaluated to give an overall view of the impact of this project to all aspects of our local eco systems.</i></p> <p><i>Many thanks</i></p> <p><i>Mark Thomas</i></p> <p><i>Local Resident</i></p>	<p>people.</p> <p>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 assessment is based on the National Highways' Design Manual for Roads and Bridges (DMRB) LA 105 (Air quality) standard, which is explained in Chapter 5 Air Quality of the Environmental Statement [APP-044]. The methodology takes into account the replacement of older vehicles with newer vehicles, that are less polluting, in line with national projections, which results in lower concentrations in future years. Past monitoring data from 2015 to 2021 is presented in Table 1.5 in Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079]. Base year (2018) modelled concentrations, discussed in paragraphs 5.7.23-25 and 5.7.32-34 of Chapter 5 Air Quality of the Environmental Statement [APP-044], in line with monitored data, show air quality exceedances of the annual average nitrogen dioxide (NO₂) air quality objectives and limit values close to the motorway network. However, by the modelled construction year and opening year the NO₂ modelled results, discussed in Section 5.10 of Chapter 5 Air Quality of the Environmental Statement [APP-044], are either below the relevant limit values and air quality objectives 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 legal limits or objectives. Closer to the Scheme, between M60 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 M60 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).</p> <p>Chapter 8 Biodiversity of the Environmental Statement [REP1-025] provides a full assessment of the effects on wildlife and the habitats they rely upon, due to the construction and operation of the Scheme. This includes an assessment on the impacts to great crested newts (GCN). The assessment of impacts to GCN is supported by baseline data summaries within Appendix 8.8 GCN Survey Report of the Environmental Statement Appendices [APP-098].</p> <p>As detailed within paragraph 8.9.44 of Chapter 98 Biodiversity [REP1-025], the Applicant will use Natural England's District Level Licence (DLL) scheme to mitigate the effects of the Scheme on GCN. The DLL scheme enables the Applicant to pay for off-site compensation ponds as an alternative to a traditional mitigation licence which requires on-site mitigation. Participation in the DLL scheme ensures the Applicant complies with legal duties to protect GCN whilst enabling mitigation to be focused strategically to deliver better outcomes for the species.</p> <p>The Applicant has secured an Impact Assessment and Conservation Payment Certificate (IACPC) with respect to a DLL for GCN, which has been countersigned by Natural England (see Appendix 8.15: GCN DLL IACPC of the Environmental Statement Appendices [APP-105]).</p>
REP1-047 – Pamela Thomas		
REP1-047a	<p><i>As requested at the above open floor meeting, I would like to make the following point for consideration.</i></p> <p><i>As our country is in economic crisis, I feel that it is my duty as a taxpayer to log my concerns in relation to the proposed works because I do not consider the plan can meet its objectives, in relation to:</i></p>	<p>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</p>

Applicant Responses to Written submissions of oral submissions from OFH1		
Reference	Comment	Applicant's Response
	<p>- Improve the journey experience for users by:</p> <ul style="list-style-type: none"> - reducing congestion at peak times - reduce journey times - deliver more reliable journey times <p><i>I am a frequent user of the motorways concerned on a daily basis both at peak and off peak times of the day. I can categorically state that I have never encountered a problem joining the M60 from the M66 at any time of the day. Yes, there is a level of inconvenience having to leave the M66 and go around Simister Island but it is just that 'a slight inconvenience'. Weigh this against the queue time from Junction 17 down to past junction 15 and it pales into insignificance.</i></p> <p><i>One need only listen to and collect data from various travel alerts to know that the traffic chaos around the M60 from Junction 18 and beyond emanates from the Swinton/Worsley interchange and back-ups are further compounded by traffic joining the M60 from the Bolton/Kearsley junction. Until improvements in these key bottle neck areas are implemented, I see no point in creating a loop at Simister Island and 5 lanes between Junction 17 and 18; to do so would only serve to introduce traffic much faster onto the M60 and therefore create a build up of traffic even further back than it already is.</i></p> <p><i>The above would impact the people that live around the Whitefield and Prestwich areas. It is already difficult at peak times to join Bury New Road from arterial roads due to queues waiting to get onto the roundabout at Junction 17. Longer queues on the motorway will further impact the ability to join the motorway which will in turn add further congestion around arterial routes and therefore journey time will be extended.</i></p> <p><i>I would ask that the honourable Secretary of State take the above points from a person that lives and worked in the area into careful consideration and also to examine statistics on Junction 15 before committing millions of pounds to a scheme that in my opinion would not improve traffic congestion but would make the situation a lot worse.</i></p> <p><i>Pam Thomas</i></p> <p><i>Concerned Resident</i></p>	<p>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].</p> <p>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].</p> <p>As per the 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.</p> <p>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.</p> <p>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.</p>