M60/M62/M66 Simister Island Interchange

TR010064

7.20 APPLICANT'S COMMENTS ON BMBC LOCAL IMPACT REPORT

APFP Regulation 5(2)(q)

Planning Act 2008

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

Volume 7

October 2024

Infrastructure Planning

Planning Act 2008

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

Development Consent Order 202[ ]

APPLICANT'S COMMENTS ON BMBC LOCAL IMPACT REPORT

Regulation Reference	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010064
Application Document Reference	TR010064/APP/7.20
Author	M60/M62/M66 Simister Island Interchange Project Team

Version	**Date**	**Status of Version**
P01	15 October 2024	Deadline 2

CONTENTS

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 comments on Bury Metropolitan Borough Council's Local Impact Report which was submitted at Deadline 1A [REP1-049].

1.1.3. **Table 1-1** contains a full schedule of the Applicant's comments.

Table 1-1 - Applicant's comments on Bury Metropolitan Borough Council's Local Impact Report

Written Representations		
Reference	**Text from Local Impact Report**	**Applicant's Response**
Introduction		
		No response required.
Structure of the Report		
		No response required.
Planning Policy		
REP1-049a	*3.1 Whilst the National Policy Statement for National Networks (NPS NN) is the primary policy document which will be used by the Examining Authority to assess the Scheme, it is also necessary to have regard to the provisions of the National Planning Policy Framework (NPPF) and Bury's statutory development plan.* *3.2 Following independent examination by the Inspectorate on behalf of the Secretary of State for Levelling Up, Housing and Communities, Bury Council, along with the other 8 participating Greater Manchester districts, adopted the Places for Everyone Joint Development Plan (PfE) with effect from 21 March 2024.* *3.3 PfE is now a key part of Bury's statutory development plan alongside the saved policies of the Bury Unitary Development Plan (UDP) and the Greater Manchester Joint Minerals and Waste Plans.* *3.4 The following sets out consideration of the key issues related to the proposal in the context of relevant planning policies:*	Section 6 of the Case for the Scheme [APP-146] sets out the assessment of the Scheme against National and Local Planning Policy. All aspects of National and Local Planning Policy including the Statutory Development Plan are addressed including: • The National Policy Statement for National Networks (NPS NN). • The National Planning Policy Framework (NPPF) • The Saved Policies of the Bury Unitary Development Plan (BUDP). • Places for Everyone – Greater Manchester Spatial Strategy (PfE). As the NPS NN was in a transitional period during the acceptance period for the DCO application, the Case for the Scheme [APP-146] assesses both the NPS NN designated in January 2015 and the draft NPS NN (March 2023) which was the most recent version at the time of the NPS NN designated in May 2024. Two sets of NPS NN accordance tables for each version of the NPS NN [APP-147 and APP-148) form part of the DCO application. PfE was adopted in March 2024 just before the period of acceptance for the DCO application. The Case for the Scheme assessed the composite version of the plan dated August 2023. Due to the changes in status of both the NPS NN and PfE between the time of submission and acceptance of the DCO application, the Planning Inspectorate (PINS) requested confirmation from the Applicant of any changes in the policy wording of both the NPS NN and PfE and an assessment of those changes which was duly provided [AS-007].
REP1-049b	***Boosting Northern Competitiveness*** *3.5 One of the key elements of the PfE strategy is to rebalance the Greater Manchester economy and, in doing so, it seeks to boost northern competitiveness.* *3.6 PfE Policy JP-Strat 6 (Northern Areas) states that a significant increase in the competitiveness of the northern areas will be sought. There will be a strong focus on making as much use as possible of suitable previously-developed (brownfield) land through urban regeneration, enhancing the role of the town centres and diversifying the residential offer. This will be complemented by the allocation of sites for development that will help to boost economic opportunities and diversify housing provision. Improving transport connections and accessibility by public transport, cycling and walking will be a priority to ensure access to key employment opportunities. In supporting the principles*	Section 1 of the of the Case for the Scheme [APP-146] sets out that if the capacity constraints on the northern section of the M60/M62 are not addressed, its impact on the wider transport network in the north could hold back growth across the region. Some of the busiest stretches of road in the UK are located on the M60 between Junction 8 and Junction 18, and the combination of local and strategic traffic, coupled with the design of the road, further exacerbates congestion and environmental problems. The specific objectives of the Scheme encompass rebalancing of the Greater Manchester economy and to boost northern competitiveness through: • Improving the journey experience for users of this section of our network by: • Reducing congestion at peak times • Reducing journey times • Delivering more reliable journey times • Providing a scheme that is safe for all road users. • Minimising the impact of the Scheme on the surrounding environment including within Noise

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	of inclusive growth, the significant increases in economic growth in this location will help to reduce deprivation. *3.7 The most significant proposed intervention in the northern areas is focused on the M62 corridor from Junction 18 (Simister Island) to Junction 21 (Milnrow), extending across parts of Bury, Rochdale and Oldham. This area is referred to as the North East Growth Corridor and the potential for this location to deliver transformative change has led to the formal designation of the Atom Valley Mayoral Development Zone (MDZ) covering the three key areas for growth at the Northern Gateway (Policies JPA1.1 and JPA1.2), Stakehill (Policy JPA2) and Kingsway Business Park.* *3.8 PfE Policy JP-Strat 7 (North East Growth Corridor) states that lying within the area and policy framework covered by policy JP-Strat 6, the North East Growth Corridor, which extends eastwards from Junction 18 of the M62 and incorporates the Atom Valley MDZ, will deliver a nationally-significant area of economic activity. This will be supported by a significant increase in the residential offer, thereby delivering truly inclusive growth over the lifetime of the Plan.* *3.9 It is considered that improvements to the SRN at Simister Island will support PfE's growth objectives for the North East Growth Corridor and the wider Northern Areas.*	Important Areas (NIA) and Air Quality Management Areas (AQMA). • Supporting future economic growth across the Greater Manchester area by delivering against local aspirations set out in regional and local authorities' transport strategies and local plans. Section 5 of the Case for the Scheme [APP-146] further confirms 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 a key part of the overall strategy for the Northern Areas set out in Policy JP-Strat 6 and JP-Strat 7.
REP1-049c	***Green Belt*** *3.10 Relatively small areas of land to the west and south of M62 Junction 18 is designated as Green Belt.* *3.11 Paragraph 152 of the NPPF states that Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.* *3.12 Paragraph 153 of the NPPF requires local planning authorities to give any harm to the Green Belt substantial weight. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.* *3.13 The proposed development does not meet any exceptions listed in Paragraph 154 or 155 of the NPPF. As such, the proposal is constitutes inappropriate development in the Green Belt which should not be approved except in very special circumstances (VSC) that outweighs the harm resulting from the proposal.* *3.14 The chapter 'Green Belt' further considers this matter.*	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-eastern corner of the Order Limits from the Green Belt and allocated it for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the Order Limit which have been removed from the Green Belt. As the Order Limits also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21 hectares of land within the Order Limits within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order 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 be within the Green Belt. The Case for the Scheme [APP-0146] sets out the National Planning Policy for Green Belt land and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limit would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer within the Green Belt following its removal by PfE. The potential impact on the openness of the Green Belt is now mainly

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		limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction. National Planning Policy establishes that there can be other reasons in the form of very special circumstances that justify development in the Green Belt and outweigh any harm. The Applicant considers that the very special circumstances in this case 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.
REP1-049d	***Flood Risk*** *3.15 PfE Policy JP-S4: Flood Risk and the Water Environment expects development to manage surface water runoff through sustainable drainage systems and as close to source as possible.* *3.16 The Case for the Scheme (APP-146 Ref. TR010064) sets out that surface water runoff will be discharged to the following hierarchy order:* *• Into the ground (infiltration)* *• To a surface water body* *• To a surface water sewer, highway drain or another drainage system* *• To a combined sewer.* *3.17 As the scheme is, for the most part, an alteration to an existing highway alignment, the general strategy is that the drainage of highway run-off would follow the existing arrangement. It will only be adjusted to suit new pavement locations, before continuing to attenuate and ultimately discharge at the watercourse or existing highways network.* *3.18 Policy JP-S4 also seeks to ensure that sustainable drainage systems are designed to provide multifunctional benefits wherever possible including for water quality, nature conservation and recreation.* *3.19 Chapter 2, the Scheme of the Environmental Statement (ES)(TR010064/APP/6.1) sets out the details of 4 attenuation ponds and on treatment pond that will be provided as part of the scheme. The five ponds are designed to be permanently wet to function as retention basins, providing water quality treatment and biodiversity benefits.* *3.20 It is considered that improvements to the SRN at Simister Island would comply with Policy JP-S4. The chapter 'Road Drainage and Water Environment' further considers these matters.*	The Scheme design has considered a variety of options for the mitigation of potential surface water drainage and flood risk impacts, including nature based solutions. Where practicable, sustainable drainage systems (SuDS), flow conveyance and attenuation features (e.g. attenuation ponds, swales, filter drains, etc.) have been used to reduce the impact of surface water runoff being discharged on the natural environment, thereby reducing flood risk and improving water quality. These measures, in particular SuDS, typically include areas of planting and therefore also have the potential to improve biodiversity and absorb small amounts of carbon dioxide (CO2) from the atmosphere. Further information is included in Chapter 13: Road Drainage and the Water Environment of the Environmental Statement [APP-REP1-027] and Appendix 13.7: Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. Where practicable, ponds are the preferred method of attenuation storage as they also provide a water quality treatment function. An additional permanent water depth of 0.3m is designed at the bottom of the attenuation ponds (below the attenuation pond outlet pipe invert level) to create a permanently wet pond. This will provide water quality treatment and biodiversity benefits. SuDS drainage will have a service life of 60 years and sufficient capacity to accommodate additional runoff associated with an increase in rainfall intensity due to climate change of 30%. However, there will be no increase in discharge rate from the SuDS as the additional runoff will be managed through the implementation of attenuation solutions, coupled with flow controls within all drainage networks. Chapter 2, the Scheme of the Environmental Statement [APP-041] sets out the details of four attenuation ponds and one treatment pond that will be provided. The five ponds are designed to be permanently wet to function as retention basins and achieve the desired treatment efficiencies. In addition to attenuation ponds, runoff will be collected via surface water channels, kerbs and gullies, filter drains, slit drains, linear drains, combined kerb drainage and combined carrier and filter drains. Oversized pipes (1.2m diameter) will be installed in the central reservation of the M60 mainline from Haweswater Aqueduct underpass and will tie into the existing drainage network prior to the Bury Old Road overbridge.
REP1-049e	***Clean Air*** *3.21 PfE Policy JP-S5 requires planning applications for development that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impact on air quality can be fully assessed and development only permitted where*	The air quality assessment is provided in Chapter 5: Air Quality of the Environmental Statement [APP-044]. This outlines that there are no adverse impacts of the Scheme during operation on air quality which will warrant a change to the design or additional mitigation measures.

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	they are acceptable and/or suitable mitigation can be provided. *3.22 Chapter 5 Air Quality of the ES (TR010064/APP/6.1) for the improvement works to the SRN reports set out relevant air quality data and mitigation measures. The chapter 'Air Quality' further considers this matter.*	
REP1-049f	***Long-Term Economic Growth*** *3.23 PfE Policy JP-J1 states that a thriving, inclusive and productive economy will be sought in all our boroughs and includes a range of measures to achieve this including by maximising the potential of the key growth locations (including the Northern Areas and the North East Growth Corridor) to deliver inclusive growth across the sub-region by ensuring that employment growth opportunities are well connected and accessible to all residents.* *3.24 It is considered that improvements to the SRN at Simister Island will support PfE's aspirations for long-term economic growth and the proposal is, therefore, consistent with PfE Policy JP-J1.*	The Applicant notes that Bury Metropolitan Borough Council considers the Scheme to be consistent with PfE Policy JP-J1. The Scheme is nationally significant being an alteration to a major interchange on the SRN. The Scheme improves connectivity nationally as well as across Greater Manchester. This improves connectivity across the sub-region and helps provide additional capacity on the SRN to accommodate additional traffic which is forecast to occur. The improvement of journey reliability and reduction in journey times bring economic benefits with every £1 spent on the Scheme realising a benefit of £1.17. The Scheme has also taken into account the requirements of the local development plan, which is the Bury Unitary Development Plan (UDP) and PfE. Overall, providing additional capacity on the SRN 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. The Applicant notes the comments and confirms that the Core Scenario used for modelling future traffic in the Transport Assessment [APP-149] includes 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 (TR010064/APP/7.4). 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 SRN capacity to accommodate this should planning permission be granted in the future.
REP1-049g	***Landscape Character*** *3.25 The site is designated as part of Prettywood, Pilsworth and Unsworth Moss Mosslands and Lowland Farmland Landscape Character Area and part of Simister, Slattocks and Healds Green Urban Fringe Farmland under PfE Policy JP-G1. PfE Policy JP-G1 replaced UDP Policy EN9/1 Special Landscape Area.* *3.26 Development within landscape character areas should reflect and respond to the special qualities and sensitivities of the key landscape characteristics. The interface of new development with the surrounding countryside/landscape is of particular importance. These transitional areas require well-considered and sensitive treatment.* *3.27 As referred to above, the Environmental Masterplan at figure 2.3 indicates considered treatments, drainage and mitigation to the surrounding area. As such, it is considered that the proposal and the transitional areas have been well-considered to support the interface of the development with the surrounding landscape as best as can considering that the proposals are for an improvement to the existing SRN.*	The Applicant notes the comments and confirms that Figure 7.7 Photomontages of the Environmental Statement Figures [APP-067] provide visualisations of the Scheme. Viewpoints reflect a broad range of views from four locations around the study area. The figures show the existing views and the views with the Scheme in place to allow direct comparison. The landscape planting included in the photomontages is shown on Figure 2.3, the Environmental Masterplan of the Environmental Statement Figures [APP-057]. The photomontages reflect two scenarios in different seasons: • The worst-case scenario (sheet 1) shown in winter in the first year of opening of the Scheme (Year 1, 2029) where the mitigation has only just been completed. More of the earthworks, structures, signage, as well as traffic would be visible in these views, therefore, reflecting views when the Scheme will be most visible. • The design year (sheet 2) is shown in summer, 15 years after completion (Year 15, 2044). This reflects the mitigation establishment. Native woodland, trees and shrubs new hedgerows with hedgerow tree planting will be would have sufficiently established to help integrate the Scheme into the surrounding landscape and also provide screening for much of the Scheme.

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REP1-049h	***Biodiversity*** *3.28 PfE Policy JP-G8 states that through local planning and associated activities a net enhancement of biodiversity resources will be sought and sets out a range of measures to achieve this.* *3.29 Whilst the proposal does not affect any designated biodiversity interests, Policy JP-G8 states that development will be expected to achieve a measurable net gain in biodiversity of no less than 10%.* *3.30 Biodiversity net gain is not currently mandated for NSIPs, however the draft NPS NN has introduced a new requirement to provide 10% BNG from November 2025.* *3.31 The Scheme includes replacement and new areas of landscaping and other ecological and planting improvements. These are shown on Figure 2.3 the Environmental Masterplan of the ES Figures (TR010064/APP/6.2). These enhancements incorporate:* *• Mixed woodland planting to reinstate native species.* *• Species rich grassland.* *• Reinstated native linear tree belts.* *• Mixed broadleaf woodland on embankments to break up the scale of the motorway.* *• New trees, shrubs and hedgerow planting to provide landscape integration and visual screening of the Northern Loop and Simister Pike Fold Bridge.* *• New landscape and woodland planting to provide landscape integration.* *• Marsh and wet grassland and marginal planting at wet drainage features.* *• Creation of wet woodlands.* *• Planting of embankments and visual screening including broadleaf woodland and coniferous/evergreen species.* *• Individual tree planting.* *• Maintenance of wildflower habitats.* *• Log piles, brash piles and standing deadwood to provided microhabitats for invertebrates and amphibians.* *• Bat and bird boxes.* *3.32 Whilst the above mitigation does not equate to a 10% net gain as required by JPA-G8, there will be an overall improvement in the ecological value of land within the DCO limits, with a forecast of an overall net gain of 3.68% for habitats and 58.5% for hedgerows. The chapter 'Biodiversity' further considers biodiversity and ecology.*	The Environment Act 2021 received Royal Assent on 9 November 2021 and contains provisions for the protection and improvement of the environment, including biodiversity. The 'biodiversity gain objective' is that the biodiversity value attributable to a scheme must exceed the pre-development value by at least 10% ("mandatory BNG"). This post-scheme biodiversity value may comprise onsite habitat, any offsite biodiversity gain and any biodiversity credits. The overall effect has to be a net gain offset against any harm to biodiversity. The government intends that mandatory BNG should apply to all nationally significant infrastructure projects (NSIPs) accepted for examination by November 2025. NSIPs accepted for examination before the commencement date are not required to deliver mandatory BNG. Although there is no statutory requirement to do so, the Applicant has forecast that the Scheme will achieve an overall net gain of 3.68% for habitats and 58.5% for hedgerows. This includes habitat retention, creation and enhancement to woodland and grassland habitats.
REP1-049i	***Health*** *3.33 PfE Policy JP-P6 sets out a range of measures aimed at tackling health inequalities, including a requirement, as far as is practicable, for new development to be supported by a Health Impact Assessment where the development would require to*	The Applicant notes the comments and confirms that the impacts of the Scheme on population and health, and details of the mitigation measures proposed to avoid or reduce adverse effects, are set out in Chapter 12 Population and Human Health of the Environmental Statement [APP-051] The Population and Human Health assessment draws on the air quality, landscape and visual, geology and soils, noise and vibration, and road drainage and water environment assessments reported in the Environmental Statement chapters 5

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	be screened for an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing. *3.34 Chapter 12 Population and Human Health of the ES (TR010064/APP/6.1) provides an assessment of the likely significant effects of the scheme on human health. It also sets out the mitigation required to avoid or reduce adverse health effects identified as resulting from the construction and operation of the Scheme and the cumulative impacts on the health of local communities.* *3.35 The chapters 'Air Quality', 'Geology and Soils', 'Noise and Vibration' and Population and Human Health further consider health impacts.*	[APP-044], 7 [APP-046], 9 [APP-048], 11 [APP-050] and 13 [REP1-027] respectively.
REP1-049j	***Strategic Road Network*** *3.36 The Strategic Road Network (SRN) will be required to perform the function of facilitating the safe and efficient movement of people and goods. Ongoing collaboration between National Highways, Transport for Greater Manchester (TfGM) and the Local Authorities will be essential in ensuring that the SRN in Greater Manchester operates in an effective and efficient manner; and contributes to sustainable economic growth. Greater Manchester benefits from a strategic location on the national motorway network, but some stretches of the city-region's motorways and trunk roads are congested, which causes slow and unreliable journeys and reduces economic efficiency. Major investment is already coming forward through the National Highways Roads Investment Strategy (RIS) to address some of these issues, for example through progression of the Smart Motorway programme for the M56, M62 and M6 and the Simister Island interchange improvements.* *3.37 Where PfE Policy JP-C4 (The Strategic Road Network) states that the Council will work with Department for Transport, National Highways, Transport for the North and TfGM to ensure a co-ordinated approach to the planning and delivery of potential interventions on the SRN and at interfaces with the local street network, as Local Plans, site Masterplans and planning applications come forward in accordance with Department for Transport, National Highways, and other UK Government policy and guidance as applicable.* *3.38 The proposal at Simister Island is specifically referred to in PfE as being a key example of the necessary improvements to Greater Manchester's Strategic Road Network and the proposal is in conformity with PfE Policy JP-C4.*	The Applicant's analysis of various traffic data indicates there are significant delays throughout the Scheme area on the M60, M62 and M66, with speeds as low as 20mph in both AM and PM periods. This is due to a combination of the high volumes of traffic using this section of the network, the weaving manoeuvres associated with merging and diverging between junctions (including junction 18 and junction 17) and downstream slow-moving traffic extending back from junction 15. Furthermore, the slip roads to the junction 18 roundabout experience low speeds as traffic queues at the signals. Significant delays occur on the merges and diverges at junction 17 and junction 18, particularly for westbound merging traffic at junction 18 in both peak time periods. Traffic travelling clockwise round the M60 is required to route via the roundabout through three sets of traffic signals and consequently experiences delays on a regular basis. These issues indicate that network improvements are required to reduce congestion and delays. The Scheme seeks to improve these issues through providing additional capacity on the M60 junction 17 to junction 18 mainline and an additional free-flow link at the junction. The network changes to be delivered through the Scheme will increase network capacity, reduce congestion/delays, and improve the flow of traffic through, and within the vicinity of, M60 junction 18 providing benefits to road users and freight movements. The benefits of the Scheme are set out in the Case for the Scheme [APP-146] and the Transport Assessment [APP-149]. If nothing is done, congestion will increase on routes around M60 junction 18 and the strategic road network, thus the Scheme is required to resolve the identified traffic related problems that exist now and in the future. A further consequence of doing nothing is that the existing network in the Scheme area has insufficient capacity to accommodate traffic from aspirational development growth in the Northern Gateway area and across Greater Manchester. The quantified Benefit to Cost ratio (BCR) of the Scheme is 1.17, which is considered low, but positive, value for money. However, the value for money of the Scheme is further enhanced by a strong strategic dimension as set out above. In accordance with government guidance, the determination of a scheme's value for money should extend beyond its BCR value and other benefits such as promoting economic growth are not captured and monetised within the BCR. The Scheme delivers a large number of benefits and aligns with several objectives of the NPS NN (this includes the NPS NN designated in January 2015 and the recent NPS NN designated in May 2024) for the strategic road network which demonstrates the need for the Scheme. As outlined in paragraph 3.27 of the NPS NN designated in May 2024, 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

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		September 2019 (prior to COVID-19), and 8.7 seconds per vehicle per mile in the year ending September 2016 (when this data series began). In the year ending September 2023 average speed on the SRN was 57.2mph, down from 58.1mph in the year ending September 2019 (prior to COVID-19) and 58.8mph in the year ending March 2016 (when this data series began)". Analysis of various traffic data indicates that the above delay issue is also a problem within the Scheme area with speeds as low and 20mph in both AM and PM periods. While paragraph 3.28 of the NPS NN designated in May 2024 highlights that the National Road Traffic Projections have modelled a variety of traffic growth scenarios between 2025 and 2060, with forecasts ranging from 9% to 54% growth, with the core scenario projecting a 22% increase. This highlights that the current situation at the Simister Island Interchange will only be exacerbated should the Scheme not be implemented. Paragraph 3.31 of the NPS NN designated in May 2024 states that "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". The Simister Island Interchange between the M62, M60 and M66 is one of the busiest motorway junctions in the north-west and the Scheme will therefore reduce congestion at one of key pinch points in the strategic road network.
REP1-049k	***Walking and Cycling*** *3.39 PfE Policy JP-C5 Walking and Cycling seeks to deliver a higher proportion of journeys made by walking and cycling. The scheme includes modest enhancement for recreational walkers through the inclusion of a new route through an area of ecological mitigation. There would be some temporary effects on Public Rights of Way (PRoW) during construction and replacement routes would be provided for the existing PRoW affected by the scheme.* *3.40 It is considered that improvements to the SRN at Simister Island is consistent with PfE Policy JP-C5. The chapter 'Traffic, Transport and Access' further considers active travel.*	The Applicant confirms that effects on walkers, cyclists and horse users during operation have been assessed as not significant. The Scheme includes a modest enhancement for recreational walkers through the inclusion of a new route through an area of ecological mitigation as shown on Figure 2.3 Environmental Masterplan [APP-057]. There will be some temporary effects on Public Rights of Way (PRoW) experienced during construction. Replacement routes will be provided for the existing PRoW affected by the Scheme, including any public footpaths where they are affected by new drainage ponds, wetlands or swales. These are shown on the Streets, Rights of Way and Access Plans [APP-008] that show streets and PRoW. A replacement PRoW is being included where the Northern Loop footprint will impact on an existing PRoW and is being realigned around the Northern Loop. There are also two PRoW south of junction 18 which are being extinguished and a replacement route through the biodiversity mitigation area will provide a better quality route than the extinguished route. The Scheme will not cause any new severance of existing routes for walkers, cyclists and horse riders (WCH). The effects on community severance is assessed as negligible negative. The key objectives of the Scheme include: to reduce peak congestion; delivering journey time reliability and improving safety on this motorway section of the SRN. There are already several formal crossing points of the M60 and M66 within the Order Limits (Sandgate Road, Castle Road, Hills Lane, and Simister Lane) as well as Old Hall Lane Footbridge just south of the Order Limits. Therefore, providing further pedestrian, cyclist and equestrian infrastructure would provide limited benefits.
REP1-049l	***Infrastructure Implementation*** *3.41 PfE Policy JP-D1 (Infrastructure Implementation) states that to ensure the*	The Scheme is a major upgrade of the Simister Island Interchange.

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	effective development and implementation of the infrastructure needed to deliver the vision and objectives of the Plan, the Councils will take a long term, strategic, holistic and integrated approach to place shaping, supported by devolved resources and powers. Utilising the spatial locations set out in PfE,a place-based approach will be undertaken to overcome barriers, achieving prosperity and opportunity. *3.42 It also states that the Councils will work with infrastructure providers to:* *• promote collaboration and synchronisation of investment plans, including those of National Highways; and* *• Minimise disruption to highways and businesses during major infrastructure upgrades and pipe subway construction* *3.43 The Simister Island improvements represent a key infrastructure investment that will help support the strategic growth objectives set out in PfE.* *3.44 The Outline Traffic Management Plan (document reference APP-150) sets out the proposals for the temporary traffic management measures and communication with businesses required during construction of the scheme.* *3.45 It is considered that improvements to the SRN at Simister Island would be consistent with PfE Policy JP-D1. The chapter 'Traffic, Transport and Access' further considers transport impacts.*	
REP1-049m	***Northern Gateway*** *3.46 Northern Gateway is identified in PfE as one of the key growth locations that would help to deliver a central theme of the spatial strategy and deliver inclusive growth across the city region, complemented by a key aim to boost the competitiveness of the northern parts of Greater Manchester.* *3.47 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 with wider benefits on a regional and national level. Northern Gateway comprises two key sites:* *• Heywood/Pilsworth - Policy JPA1.1* *• Simister/Bowlee - Policy JPA1.2* *3.48 The site at Heywood/Pilsworth provides an opportunity for a substantial and high-quality employment led development. This will be supported by new communities as part of the Heywood/Pilsworth site, as well as at Simister/Bowlee.* *3.49 The Simister Island proposal seeks the creation of the northern loop (M60 eastbound to M60 southbound link), the M66 southbound diverge and two drainage ponds within part of the JPA1.1 site.*	Part of the proposed Places for Everyone 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 and it has been confirmed that it does not compromise the delivery of the Northern Gateway.

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	3.50 Policy JPA1.1 sets out the requirements for substantive new employment-led development on the Heywood/Pilsworth site. It is therefore not considered to be applicable to the Simister Island proposal.	
REP1-049n	***Wildlife Links and Corridors*** *3.51 Saved UDP Policy EN6/4 Wildlife Links and Corridors identifies corridors along the motorway edges.* *3.52 Policy EN6/4 states that the Council will seek to consolidate and, where appropriate, strengthen wildlife links and corridors, and will not permit development which would adversely affect identified areas. In particular, the Council will seek to ensure that new development within or adjacent to identified links or corridors, contributes to their effectiveness through the design, landscaping and siting of development proposals and mitigation works, where appropriate.* *3.53 The Environmental Statement Chapter 8 Biodiversity (APP-047 Ref. TR010064) section 8.8 identifies that there is potential to fragment habitats due to removal of connections. The design of the Scheme has taken into account the locations of valuable and priority habitats, including important connective habitats (i.e. hedgerows, watercourses and tree lines) and the locations of protected species. Where practicable, the design of the Environmental Masterplan has been modified to avoid impacts of these features and retention of existing vegetation is proposed. The scheme would then be landscaped in accordance with figure 2.3, including measures such as mixed woodland, broadleaf, shrub planting, marginal planting, species rich grassland, wet grasslands and ponds and swales.* *3.54 It is considered that the proposal would contribute to the effectiveness of wildlife links through the measures and mitigation works embedded in the design of the landscaping masterplan.*	The Environment Act 2021 received Royal Assent on 9 November 2021 and contains provisions for the protection and improvement of the environment, including biodiversity. The 'biodiversity gain objective' is that the biodiversity value attributable to a scheme must exceed the pre-development value by at least 10% ("mandatory BNG"). This post-scheme biodiversity value may comprise onsite habitat, any offsite biodiversity gain and any biodiversity credits. The overall effect has to be a net gain offset against any harm to biodiversity. The government intends that mandatory BNG should apply to all nationally significant infrastructure projects (NSIPs) accepted for examination by November 2025. NSIPs accepted for examination before the commencement date are not required to deliver mandatory BNG. Although there is no statutory requirement to do so, the Applicant has forecast that the Scheme will achieve an overall net gain of 3.68% for habitats and 58.5% for hedgerows. This includes habitat retention, creation and enhancement to woodland and grassland habitats. Figure 2.3: Environmental Masterplan shows an illustrative landscaping scheme. The landscaping scheme is secured by Requirement 5 of the draft DCO [REP1-004]. Requirement 5 (landscaping) prohibits any part of the authorised development commencing until a landscaping scheme for that part, covering all hard and soft landscaping works, has been approved by the Secretary of State following consultation with the relevant planning authority. The proposed landscaping scheme must reflect the relevant mitigation measures in the Register of Environmental Actions and Commitments (REAC), contained within the First Iteration Environmental Management Plan [REP1-010], and must be based on Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-057].
REP1-049o	***Minerals*** *3.55 The Greater Manchester Joint Minerals Plan (GMJMP) forms part of Bury's statutory development plan. Map 21 (Bury) of the Plan shows that there are Minerals Safeguarding Areas for both Brick Clay and Sandstone within the Order Limits (see following plan)*	Minerals safeguarding is considered in Chapter 10: Material Assets and Waste of the Environmental Statement [APP-049] and Figure 10.1 Mineral Safeguarding Areas, Mineral Areas of Search and Peat Deposits of the Environmental Statement Figures [APP-070]. The construction of the Scheme necessitates the permanent acquisition and use of land within the Order Limits, beyond the existing highway boundary. This would result in the partial sterilisation of Mineral Safeguarding Areas for Sand and Gravel, Brick Clay, and Coal; a Mineral Area of Search for Sand; and superficial peaty soils / horizons. Despite this, these areas have been scoped out of the environmental assessment on the basis that no substantial sterilisation of the mineral resource is likely to occur. Additionally, these areas are neither operational extraction sites or mineral sites specifically identified / allocated in strategic planning documents as those that will be mined or extracted, nor are they existing or potential peat extraction sites. The above determination is supported by comment references 4.6.1 and 4.6.2 in Appendix 4.1: Scoping

Written Representations		
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	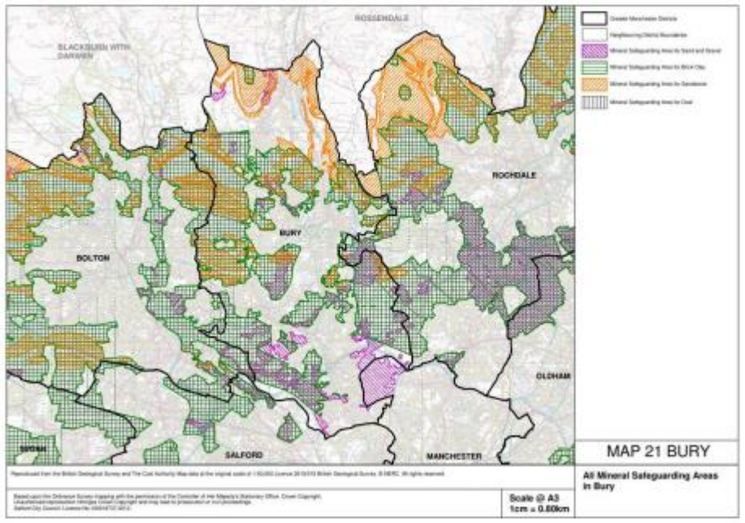 *3.56 Policy 8 of the Greater Manchester Joint Minerals Plan relates to the prior extraction of mineral resources within Mineral Safeguarding Areas and states that all non-mineral development proposals within the Mineral Safeguarding Area should extract any viable mineral resources present in advance of construction.* *3.57 This matter is considered in paragraph 6.20.8 of The Case for the Scheme (Document ref: APP-146) which states that although the Order Limits include areas safeguarded for Minerals Safeguarding Areas, notwithstanding this, both mineral safeguarding sites and peat resources have been scoped out of this assessment on the basis that they are not resources that could be worked/extracted.*	Opinion Response Table of the Environmental Statement Appendices [APP-076]. It is further reinforced by the results of the Applicant's consultations with the Greater Manchester Minerals and Waste Planning Unit and the Coal Authority, as detailed in paragraph 10.8.17 of Chapter 10: Material Assets and Waste of the Environmental Statement [APP-049]. That consultation confirmed that the sterilisation of the mineral resource is unlikely, and therefore, no prior extraction of mineral resources is necessary. Notwithstanding this, the Scheme has taken steps to safeguard mineral resources within the Order Limits where reasonably practicable. This has been achieved by minimising encroachment within these mineral safeguarding areas through careful consideration of the location and extent of carriageway widening, as well as the alignment of the new offline carriageway.
Air Quality		
REP1-049p	*4.1 Air quality was assessed within Chapter 5 (APP-044) of the ES to determine effects of the scheme based on information available at the preliminary design stage. This chapter within the ES outlines baseline conditions and potential impacts during construction and operation. It also identifies mitigation measures recommended for any potentially significant adverse effects.*	Noted. Mitigation measures are outlined in Section 5.9 of Chapter 5: Air Quality of the Environmental Statement [APP-044].
REP1-049q	***Context*** *4.2 The ES details that a qualitative assessment of the effects on air quality from construction has been undertaken in line with Design Manual for Roads and Bridges (DMRB) guidance, taking account of the nature of any proposed construction activities that have the potential to generate dust and the location of sensitive receptors. The air quality study area for assessing potential impacts of construction dust during the*	The Applicant notes that paragraph 4.2 of the Local Impact Report [REP1A-001] is only referring to the construction dust element of the assessment. A detailed quantitative assessment of construction traffic was undertaken (including re-routing effects) using the same methodology as for the operational effects discussed in paragraph 4.3 of the Local Impact Report [REP1A-001] to estimate air pollution concentrations. However, the Local Impact Report [REP1A-001] does go on to discuss the construction traffic assessment in paragraphs 4.11 onwards.

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	construction phase is defined as the area within 200m of the boundary of the footprint of the proposal's construction activities. *4.3 For operational effects, the assessment was undertaken to determine whether levels of NOx, NO2 and PM10 would exceed air quality thresholds. The study area is defined as the area within 200m of the roads meeting the traffic screening criteria within the DMRB LA 105 air quality standard.* *4.4 The key receptors which can be impacted by changes in air quality are human health receptors such as residential properties, schools and hospitals; in addition to ecological receptors such as statutory designated sites (Sites of Special Scientific Interest (SSSI)) and non-statutory designated sites (Local Wildlife Sites (LWS), Sites of Biological Interest (SBI) and Local Nature Reserves (LNR).* *4.5 The Proposed Scheme is situated within the Greater Manchester Air Quality Management Area (AQMA).* *4.6 Bury Council has been identified by Department for Environment Food and Rural Affairs (Defra) as an area requiring to significantly improve air quality. The required measures to do this are currently under discussion.* *4.7 Ecological sites are sensitive to changes in air pollution, such as nitrogen dioxide, and are located within the air quality study area. These include the Rochdale Canal Special Area of Conservation (SAC)/SSSI, SBI, LNR, and LWS.*	
REP1-049r	***Summary of construction impacts*** ***Dust emissions*** *4.8 The ES states that there is potential for elevated dust deposition and soiling at properties within 200m of the construction site boundary, resulting from the construction works. The amount and distribution of dust emission would vary depending on the duration and location of activity, weather conditions, and effectiveness of suppression measures.* *4.9 The proposal has the potential for construction dust to affect human health and ecological receptors and as shown in the below table.* **Number of sensitive receptors likely to be affected by construction dust**	The Applicant notes Bury Metropolitan Borough Council's summary of construction dust impacts of the Scheme. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the construction dust assessment, the mitigation and how this is secured, as set out in Issue Reference 1 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].

Type of receptor	Distance from construction activities		
	0-50m	50-100m	100-200m
Human health	570	576	1174
Designated habitat - LNR	1	0	0
Designated habitat – LWS/SBI	2	0	2
Total	573	576	1176

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	4.10 Based on the number of receptors within the distance bands and the large potential for dust emissions to occur during the construction activities associated with the proposed scheme, the construction dust risk is High, resulting in a ***negative*** *impact. However, these effects would be temporary and can be minimised through mitigation measures.*	
REP1-049s	***[Summary of construction impacts]*** ***Construction traffic – Human Health*** *4.11 Concentrations of pollutants were estimated for 2028, which would be the scheme's anticipated worst-case construction year, at a total of 415 worst-case human health receptors. The modelling predicted exceedances of the NO2 AQO in both the 'without development' and worst-case construction year (2028) scenario at seven receptors:* *• R3, R81, R441, R447, R599, R600, R601 – located at Kensington Street, Whitefield, which lies to the north of the motorway and backs on to the M60 between J17 and J18.* *4.12 However, of the seven receptors that exceed the annual mean AQO, the concentrations are reduced in the construction scenario compared to the without development scenario (a reduction of 0.6µg/m3) and a maximum concentration of 43.7µg/m3 (R441) compared to the AQO of 40µg/m3. The magnitude of the change would be minor. The remaining receptors were all predicted to be below the annual mean AQO for NO2.* *4.13 All predicted PM10 concentrations were well below the AQOs for PM10 and PM2.5 at all receptors, with a maximum of level of 18.2 µg/m3. All changes in concentrations during the worst-case construction year (2028) were imperceptible (<0.4 µg/m3).* *4.14 Consequently, the overall effect of the traffic associated with the construction of the Scheme, on air quality, is considered 'not significant' and therefore, is considered to have a* ***neutral*** *effect on air quality impacts on human health.*	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's construction traffic air quality impacts on human health. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the construction phase traffic risk assessment methodology and conclusions, mitigation and how this is secured, as set out in Issue Reference 3 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049t	***[Summary of construction impacts]*** ***Construction traffic – Ecological Receptors*** *4.15 The ES states that total nitrogen deposition was modelled for 310 construction sensitive ecological receptors within 200m of the Affected Road Network (ARN). Four of the modelled receptors, across two designated sites were predicted to have a combined total deposition rate above the minimum critical load and a predicted change in nitrogen deposition of more than 1% of the minimum critical load and of more than 0.4 kg N/ha/year.* *4.16 The receptors are located next to the on-slip road heading west at M60 J17 at:* *• Philips Park and North Wood LWS (SBI)* *• Philips Park LNR.*	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's effect on ecological sites as a result of construction traffic. It should be noted that the reference to ecological receptors are related to transects used to model each ecological site, for each site typically a transect of up to 21 receptor points was used (e.g. one every 10m from 0m to 200m inclusive). Therefore, the number of ecological sites modelled was actually 15. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the ecological impact assessment of the construction and operational phases of the Scheme in terms of its methodology and conclusions, mitigation and how this is secured, as set out in Issue Reference 5 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].

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	4.17 The ES assesses the air quality impacts on ecological receptors in Chapter 8 Biodiversity (APP-047). Only small areas of the two sites located parallel to the existing road and slip roads are predicted to be affected by increased nitrogen deposition during the construction of the scheme. In addition, site surveys generally found an absence of species considered sensitive to nitrogen and the frequent presence of invasive non-native species at the woodland sites. Therefore, the proposal is not expected to have a significant effect on the designated habitats within these sites and is considered to have a ***neutral*** *impact.*	Paragraph 8.8.12 of Chapter 8 Biodiversity [REP1-025] identifies potential impacts to Philips Park Local Nature Reserve (LNR) and Philips Park & North Wood Site of Biological Importance (SBI) due to nitrogen deposition. No other designated sites or designated habitats with 200m of the construction affected road network (ARN) have the potential to be impacted due to nitrogen changes during construction of the Scheme. As stated in paragraph 8.10.27 of the chapter, both sites are only affected for the final year of the construction phase and the magnitude of increase in nitrogen deposition (DS-DM) during the final year of construction is smaller than the magnitude of change during operation. The impact duration of construction alone is so short-lived (1 year) that no effect on species composition would be anticipated and therefore the impact level would be no change, and the significance of effect would be neutral (not significant). The Applicant notes that Bury Metropolitan Borough Council's summary of the Scheme's effect on the sites references the sensitivity of species to nitrogen deposition. For clarity, this is presented within the Applicant's assessment of effects due to nitrogen deposition due to operation of the Scheme (as opposed to construction).
REP1-049u	***Summary of operational impacts*** ***Human health*** *4.18 Concentrations of pollutants were estimated for 2029, the scheme's anticipated opening year, at 557 worst-case human health receptors. The modelling predicted exceedances of the NO2 AQO in both the 'without development' scenario at seven receptors:* *• R3, R81, R441, R447, R599, R600, R601 – located at Kensington Street, Whitefield which lies to the north of the motorway and backs on to the M60 between J17 and J18.* *4.19 However, there are no exceedances predicted in the 'with development' scenario, so the scheme is predicted to reduce air pollution below the AQO at these locations due to the predicted reduction in congestion. The magnitude of the reduction at these seven locations is between -3.7 µg/m3 and -4.0 µg/m3 so would be classed as a medium change. A total of 188 out of the 557 receptors modelled are predicted to see reductions in NO2 as a result of the scheme.* *4.20 A total of 368 out of the 557 receptors modelled are predicted to see increases in NO2 due to the scheme. However, the modelled concentrations are all significantly below the annual mean AQO for NO2 of 40 µg/m3.* *4.21 All modelled PM10 concentrations were significantly below the AQOs / Limit Values for PM10 and PM2.5 at all receptors, with a maximum level of 19.4µg/m3. All changes in concentrations for the 'without development' and 'with development' scenarios were imperceptible (<0.4 µg/m3).* *4.22 Consequently, as the predicted concentrations for the 'with development' scenario will remove seven existing exceedances and all concentrations at modelled receptors are below the AQOs, the overall effect of the traffic associated with the operation of the Scheme, on air quality, is considered not significant. Therefore, there is an overall* ***positive*** *effect with regard to air quality and subsequently on human health due to the proposal.*	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's operational air quality impacts on human health. It should be noted that, with regard to paragraph 4.21 of the Local Impact Report [REP1A-001], it is stated that the maximum modelled PM_{10} concentration is 19.4µg/m^3. The correct maximum modelled PM_{10} concentration is 18.4µg/m^3. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the operational phase traffic risk assessment methodology and conclusions, mitigation and how this is secured, as set out in Issue Reference 4 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18]. The Applicant also notes the matter not agreed between Bury Metropolitan Borough Council and the Applicant in relation to operational air quality monitoring set out in Issue Reference 4 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].

Written Representations		
Reference	**Text from Local Impact Report**	**Applicant's Response**
REP1-049v	***[Summary of operational impacts]*** ***Ecological Receptors*** *4.23 The ES states that total nitrogen deposition was modelled for 577 relevant ecological receptors. A total of 32 of the modelled receptors, across eight designated sites were predicted to have a combined total deposition rate above the minimum critical load set by the and a predicted change in nitrogen deposition of more than 1% of the minimum critical load and of more than 0.4kg N/ha/year. These receptors are located at: Clifton Country Park WS/SBI.* *• Clifton Moss (South) LWS (SBI).* *• Clifton Wood Ancient Woodland* *• Hazlitt Wood LWS (SBI)* *• Philips Park and North Wood LWS (SBI)* *• Philips Park LNR* *• Rhodes Farm Sewage Works LWS (SBI)* *• Rochdale Canal (Scowcroft to Warland) LWS (SBI)* *4.24 Only small areas of the two sites located parallel to the existing road and slip roads are predicted to be affected by increased nitrogen deposition during the construction of the Scheme. As previously noted, site surveys generally found an absence of species considered sensitive to nitrogen and the frequent presence of invasive non-native species at the woodland sites. Therefore, the proposal is not expected to have a significant effect on the designated habitats within these sites and is therefore considered to have a* ***neutral*** *impact.*	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's effect on ecological receptors as a result of operational traffic. It should be noted that the reference to ecological receptors is related to transects used to model each ecological site. For each site, typically a transect of up to 21 receptor points was used (e.g. one every 10m from 0m to 200m inclusive). Therefore, the number of ecological sites modelled was around 20. It should be noted that paragraph 4.24 of the Local Impact Report [REP1A-001] refers to construction, but the correct reference should be to operation. The effect for operation is still neutral. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the ecological impact assessment of the construction and operational phases of the Scheme in terms of its methodology and conclusions, mitigation and how this is secured, as set out in Issue Reference 5 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049w	***Mitigation and enhancement*** *4.25 The Outline (First Iteration) Environmental Management Plan (EMP) (APP-127) includes commitments to protect air quality from construction dust and to reduce emissions from all non-road mobile machinery (NRMM). The Outline Air Quality and Dust Management Plan (APP-128) proposes controls and measures, which could include (but are not necessarily limited to):* *<u>Reducing dust emissions</u>* *• Dampening down of surfaces.* *• Planning the site layout so that machinery and dust-causing activities occur as far from sensitive receptors as possible.* *• Erecting screens or barriers around the dust-causing activities or the site boundary.* *• Covering stockpiles to prevent entrainment by wind.* *• Undertaking regular monitoring.* *<u>Minimising Emission from construction plant and vehicles</u>* *• Construction plant, vehicles and equipment would be operated in accordance with manufacturer's guidance and would be regularly maintained and checked.* *• Engines would be switched off when not in use.* *• Vehicle and construction plant exhausts should be directed away from the ground and be positioned at a height to facilitate appropriate dispersal of exhaust emissions.* *• The movement of construction traffic around the site would be kept to the minimum*	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's commitments and measures set out in the First Iteration Environmental Management Plan [REP1-010] and the relevant management plan Appendix A: Outline Air Quality and Dust Management Plan [APP-128] to manage construction air quality and dust. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the Scheme's commitments and measures set out in the First Iteration Environmental Management Plan [REP1-010] and the relevant management plan Appendix A: Outline Air Quality and Dust Management Plan [APP-128] to manage construction air quality and how this is secured, as set out in Issue Reference 3 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].

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	reasonable for the effective and efficient operation of the site and construction of the Scheme. *• Where stationary generators are required, ensure these are sited as far from sensitive receptors as practicable.* *• The use of diesel or petrol-powered generators would be reduced by using mains electricity, hybrid generators, hydrogen generators, solar panels or battery powered equipment, where reasonably practicable.* *• Speed limits on-site and on haul roads will be minimised* *• Where reasonably practical, sustainable travel (such as, public transport, cycling, walking, and car-sharing) encourage to reduce vehicle emissions.*	
Biodiversity		
REP1-049x	***European Protected Sites*** *5.1 An appropriate assessment has been provided, with only the Rochdale Canal SAC scoped into the report. It is accepted that it is very unlikely that the scheme will have a significant effect on this SAC.* *5.2 The South Pennines SPA/SAC or Manchester Mosses SAC are not referenced. They may have been screened out based on distance, but traffic on the M62 is regarded as having a potentially significant effect on both these European sites because of air pollution. Whilst accepting that during construction, there is unlikely to be any increase in traffic with more likely a decrease in traffic as the works are avoided, on completion the improved network may lead to increased traffic movements along the M62 corridor. This may have potential significant effects on these European sites, in particular given the cumulative effect of the Northern Gateway PfE allocation, which this will benefit in the long term.*	The Applicant notes Bury Metropolitan Borough Council's comment on the Scheme's Habitats Assessment Report including the conclusions of the Appropriate Assessment. The Applicant notes that the statement to inform an appropriate assessment at Appendix 8.13 of the Environmental Statement Appendices [APP-103] concludes, beyond reasonable scientific doubt, that the Scheme will not adversely affect the integrity of the Rochdale Canal SAC during its construction or operational phases, either alone or in combination with other plans or projects. The Applicant notes Bury Metropolitan Borough Council comments in relation to the South Pennines Special Protection Area/Special Area of Conservation and Manchester Mosses Special Area of Conservation. The Applicant refers to the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the screening criteria used to identify European sites based on the Design Manual for Roads and Bridges (DMRB) LA 115 Habitats Regulations Assessment and that there would be no potential impacts to these European sites through changes in air quality as set out in Issue Reference 26 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18]. There would therefore be no potential for cumulative effects due to in-combination impacts with other plans or projects. The Applicant refers Bury Metropolitan Borough Council to the Applicant's Statement of Common Ground with Natural England [REP1-017] (Issue reference 3.1) in which the assessment of impacts to European designated sites are agreed.
REP1-049y	***Hazlitt Wood SBI and other SBI's*** *5.3 The development lies immediately adjacent to this site. Other SBI's such as Hollins Plantation SBI and Philips Park SBI are in close proximity, with hydrological linkage and issues relating to air quality if traffic levels increase. A significant number of other SBI's are also discussed. All are to be protected and it is accepted that this is a feasible base on the draft environmental management plans. Hazlitt Wood is protected by the Heaton Park brick wall, therefore any additional fencing would protect this heritage feature more than the SBI. Direct effects relating to dust, debris and hydrological linkage can be avoided through the implementation of best practice. Given the existing presence of the Motorway and long-term move to electric cars, there will not be any significant effect on any of the SBI in close proximity to the site.*	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's assessment of effect on Sites of Botanical Importance (SBI) and the acceptability of the relevant commitment contained within the Register of Environmental Actions and Commitments (REAC) of the First Iteration Environmental Management Plan [REP1-010] relating to Hazlitt Wood SBI. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the Scheme's assessment of effect on SBI and the commitment set out in the First Iteration Environmental Management Plan [REP1-010] as set out in Issue Reference 27 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049z	***Great Crested Newts***	The Applicant notes Bury Metropolitan Borough Council's summary of the Scheme's assessment of effect

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	5.4 Great crested newts are confirmed as present within the zone of influence of the development. None of the ponds lost due to the development are confirmed breeding ponds. The developer is committed to district licensing and has already obtained a certificate from Natural England, which is an appropriate approach, and reasonable avoidance measures will also likely be applied. The conservation status of this species can be maintained.	on Great Crested Newts. The Applicant confirms that a countersigned Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate (IACPC) has been secured. This is reflected in Issue Reference 5.1 of the Statement of Common Ground with Natural England [REP1-017]. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to Great Crested Newts as set out in Issue Reference 28 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049aa	***Badger*** *5.5 Badger setts have been identified within the zone of influence of the development. A license will likely be required from Natural England for closure of one outlier sett. No main setts would be lost. The proposed development would also not fragment the territory of the badger clans affected as the motorway is already present and the scheme will simply it. There could be risks during construction of temporary habitat fragmentation and loss of foraging habitat due to construction activity, site compounds etc that may push badger in to attempting to cross the motorway.*	The Applicant notes Bury Metropolitan Borough Council's comments on the Scheme's effect on badgers from construction activities. Based on the current baseline data, closure of one outlier sett will be required and this is reflected in the draft badger licence (Appendix 8.14 of the Environmental Statement Appendices [REP1-029]). As per Commitment B12 of the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [REP1-010], the Applicant would undertake pre-construction surveys for badgers. This data would be used to inform the final licence application to Natural England which would be submitted after grant of a Development Consent Order but before works commence. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the assessment of Scheme effects on badgers, and licensing requirements, as set out in Issue Reference 29 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18]. This details the agreed understanding that there would be no impacts to badgers due to severance during construction.
REP1-049bb	***Barn Owl*** *5.6 Barn Owl is known to be present in the locality, but no evidence of breeding within the zone of influence was found. No new raptor nest sites have been recorded in proximity to the development site since 2021.*	The Applicant notes Bury Metropolitan Borough Council's comments on the presence of barn owls within the Scheme's study area. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the desk-top study and field surveys to determine the presence of barn owls in the study area and assess the value of the barn owl population, as set out in Issue Reference 30 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049cc	***Other Protected Species*** *5.7 All other likely and some unlikely protected species are discussed, with no evidence of any such species being significantly affected. The proposed precautionary measures and enhancement measures for species such as bats are adequate. The conservation status of this species can be maintained.*	The Applicant notes Bury Metropolitan Borough Council's comments on other protected species and welcomes Bury Metropolitan Borough Council's view that embedded and essential mitigation and enhancement measures are adequate.
REP1-049dd	***Nesting & Wintering Birds*** *5.8 Breeding and winter bird surveys have been carried out. The results indicated no more than local interest. Standard precautionary working methods will be applied. The conservation status of this species can be maintained. Mitigation should be provided for loss of bird nesting habitat.*	The Applicant notes Bury Metropolitan Borough Council's comments, although for clarity, it should be noted that breeding black-necked grebe and little ringed-plover, and wintering bird assemblages at Heaton Park Reservoir were valued by the Applicant as of County value (Paragraph 8.7.74 and 8.7.78 of Chapter 8 Biodiversity [REP1-025]). The Applicant notes Bury Metropolitan Borough Council's acceptance that the conservation status of nesting and wintering birds can be maintained. The Applicant notes Bury Metropolitan Borough Council's comments in relation to mitigation for bird nesting habitat. Bird mitigation is detailed within Paragraphs 8.9.42-43 of Chapter 8 Biodiversity of the Environmental Statement [REP1-025] and includes provision of bird boxes and habitat creation. Provision of

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		bird boxes is secured by Commitment B21 of the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [REP1-010]. The Scheme will be carried out in accordance with the landscaping scheme secured by Requirement 5 of the draft Development Consent Order [REP1-004] and will be in accordance with the mitigation measures set out in the REAC and the Environmental Masterplan at Figure 2.3 of the Environmental Statement Figures [APP-057]. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to mitigations set out in the First Iteration Environmental Management Plan [REP1-010] as set out in Issue Reference 31 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049ee	***Priority Species*** *5.9 Species such as common toad, hedgehog, water shrew and brown hare are recorded or assumed to be present. The populations present would be displaced during construction, with precautionary working method statements in place during site clearance and construction. There are unlikely to be any long-term significant effects because of the scheme, with reuse of the site possible on completion. The conservation status of these species can be maintained.*	The Applicant notes Bury Metropolitan Borough Council's comments in relation to the Scheme's assessment of effects on other notable species and the mitigation specified. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to other notable species set out in Issue Reference 32 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049ff	***Invasive Species (INNs)*** *5.10 INNs are present within the site, including Himalayan balsam and Japanese knotweed. Standard control and biosecurity measures are proposed, which should be in line with best practice. The risk of spreading these species is **very low**.*	The Applicant notes Bury Metropolitan Borough Council's comments in relation to the presence of invasive species within the Scheme and the construction measures identified to prevent their spread. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to invasive species as set out in Issue Reference 33 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049gg	***Protection of Watercourses and Ground Water*** *5.11 Comprehensive investigation of drainage and ground water appears to have occurred. Negative effects on the Castle Brook and Whittle Brook are forecast due to loss of connectivity to groundwater sources for these minor tributaries. There will also be anticipated **positive** effects due to the addition of SUDs ponds, which will filter out sediment and pollution from the motorway, with outfalls into the Castle Brook tributary. Protection during construction is proposed for watercourses and groundwater, which would be adequate.*	The Applicant notes Bury Metropolitan Borough Council's comments in relation to the protection of watercourses and ground water. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the protection of watercourses and ground water as set out in Issue Reference 34 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18]. This details Bury Metropolitan Borough Council's deference to the Environment Agency, noting the Applicant's Statement of Common Ground with the Environment Agency [REP1-018] that addresses the matters of water quality and ground water in detail.
REP1-049hh	***Peat*** *5.12 An investigation of the potential for peat to be present has occurred. This concluded that restorable peat is not present, but that isolated patches that may indicate historic mossland in this locality, has degraded beyond the point where restoration would be feasible.*	The Applicant notes Bury Metropolitan Borough Council's comments in relation to the presence of peat within the Scheme's Order Limits. Appropriate mitigation for the management and handling of soil materials, including any peat, is described within the relevant management plans included in the First Iteration Environmental Management Plan [REP1-010]. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the presence of peat as set out in Issue Reference 35 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18]. This details Bury Metropolitan Borough Council's deference to the Environment Agency, noting the Applicant's Statement of Common Ground with Natural

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		England [REP1-017] that addresses the matter of the presence of peat and restoration potential in detail.
REP1-049ii	***Priority Habitats, Ancient Woodland etc*** *5.13 Desk-top and verification on the ground for priority habitats and ancient woodland was carried out. The only priority habitats that will be directly lost are hedges, with indirect effects to woodland and other habitats such as lowland fen possible due to hydrological connectivity and dust. The assessment concludes that none are significant. Wetland sites such as Hollins Vale SBI, receive water from springs to the west of the SBI, would be unaffected by the development. Mitigation and enhancement for loss of hedges is proposed.* *5.14 Ancient woodland and priority habitats, other than hedges,* ***would not be significantly affected*** *and the loss of hedge can be mitigated.*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of the Applicant's assessment of the effects on priority habitats, and the mitigation proposed. To clarify, as detailed in Paragraph 8.10.63 of Chapter 8 Biodiversity of the Environmental Statement [REP1-025], there would also be a loss of 0.06ha of eutrophic standing water (a priority habitat) due to the loss of ponds P34, P37, P38 and P73. However, this would be mitigated through the creation of 1.19ha of new pond habitat, providing a net gain of 1.14ha of ponds. The significance of effect is assessed as slight adverse (not significant). As detailed in Paragraph 8.10.75 of Chapter 8 Biodiversity of the Environmental Statement [REP1-025], there would also be a loss of 0.11ha of lowland mixed deciduous woodland (wlf7) (a priority habitat) of the 0.16ha present within the Order Limits. The Scheme will be carried out in accordance with the landscaping scheme secured by Requirement 5 of the draft Development Consent Order [REP1-004] and will be in accordance with the mitigation measures set out in the REAC and the Environmental Masterplan at Figure 2.3 of the Environmental Statement Figures [APP-057]. Loss of lowland mixed deciduous woodland (w1f7) would be mitigated through creation of 2.90ha of new lowland mixed deciduous woodland, 0.75ha of wet woodland and enhancement of 0.04ha of retained other lowland mixed deciduous woodland as shown on the Environmental Masterplan (Figure 2.3 of the Environmental Statement Figures [APP-057]) and detailed within Section 8.9 of Chapter 8 Biodiversity [REP1-025]. It is predicted that the enhanced habitat would take 12 years to reach its target condition, and the new lowland mixed deciduous woodland and wet woodland would take 30+ years and 15 years respectively after clearance of the 0.11ha of existing habitat, to reach their target condition. Although the new and enhanced habitats would mitigate the effects in the long term, due to the time to reach target condition, the effect is, as a precaution, assessed as permanent. There would, however, be a net gain of 3.54ha of priority woodland habitat, a ratio of over 1:32. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to priority habitats as set out in Issue Reference 36 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18]. This details Bury Metropolitan Borough Council's acceptance of the study baseline, assessment of significance effect and mitigation relevant to priority habitats.
REP1-049jj	***Biodiversity Net Gain (BNG)*** *5.15 The development would result in the loss of grassland with additional loss of plantation woodland. On completion, there would be a net reduction in the area of vegetated habitat, but the proposal is to create higher ecological value than those currently present. A BNG metric has been provided that indicates a 3.68% increase on site for area-based habitats and 58.5% increase for hedge lines. The Scheme is currently exempt from mandatory BNG.*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of the Scheme's position on Biodiversity Net Gain. Table 8.17 within Chapter 8 Biodiversity of the Environmental Statement [REP1-025] provides a summary of the areas of habitat to be lost and created, along with the net loss/gain figure for each. In addition to grassland and woodland, there would be a loss in non cereal crops, ponds and scrub, however, as Bury Metropolitan Borough Council states in paragraph 5.15 of the Local Impact Report [REP1A-001], the proposal is to create habitats of higher ecological value than those currently present and so the Scheme is predicting a 3.68% increase in the value of habitats and 58.5% increase in the value of hedgerows. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to Biodiversity Net Gain and the measures to secure and manage biodiversity delivery as set out in

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		Issue Reference 37 of the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
Climate		
REP1-049kk	***Context*** *6.1 The effects on Climate, including the release of greenhouse gas emissions and the schemes vulnerability to the impacts of climate change were assessed within Chapter 14 of the Environmental Statement (ES) (APP-053).* ***Summary of Greenhouse Gas Emissions Impacts*** *6.2 The ES splits the greenhouse gas emissions generated by the construction phase and the operation phase. It states that it is not possible to identify a suitable receptor for these emissions as they do not have a localised effect. The ES also states that in isolation the scheme is not significant enough to have an impact on the achievement of net zero targets. The scheme would increase greenhouse gas emissions (GHG), as demonstrated in appendix 14.1 of the ES. This includes the emissions associated with the construction and ongoing operation of the scheme, as well as considering the increased vehicle usage.* *6.3 The applicant has several commitments to 'Net Zero' outlined in a 'Net Zero Highways' plan. Overall, the plan aims to achieve net zero emissions on the strategic road network (SRN) by 2050. The plan commits to national highways achieving:* *• Net Zero for its own operations by 2030* *• Net Zero for maintenance and construction by 2040* *• Net Zero carbon travel on the SRN by 2050* *6.4 Elements of this plan will come into effect as the scheme progresses and therefore could have an impact. The measures that were put forward to mitigate are:* *• Embodied emissions associated with construction have been reduced through the environment team working with the infrastructure design team to avoid or reduce environmental impacts. A description of the design changes can be found within 14.9.4 of chapter 14 of the ES.* *• There has also been an appreciation of the carbon stores that are already in place on site that could be affected by the scheme. Measures have been taken to reduce the impact.* *• There is planned planting of new areas of woodland and vegetation, which will help with capturing of carbon emissions.* *• Commitment to a logistics management plan to reduce emissions from transport associated with the scheme.* *• Commitment to source supplies from local areas where feasible to reduce emissions associated with transport of these materials.* *6.5 There is also suggested enhancements that the ES suggest could include*	The Applicant acknowledges Bury Metropolitan Borough Council's high-level summary of Chapter 14: Climate of the Environmental Statement [APP-053].

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	measures such as: *• Using low emission vehicles* *• Providing electric vehicle charging infrastructure* *• Using stop start technology for vehicles* *• Using renewable energy* *• Connecting to grid where possible* *• Using low resource and energy solutions for site compound and associated facilities* *• Potentially using alternative fuels.* *6.6 The ES commits to looking at the carbon intensity of the materials to be utilised. There is a carbon management plan in the first iteration EMP Appendix 0. This represents best practice for reducing carbon emissions from infrastructure projects. The ES states that works will be checked thoroughly to prevent the need to any rework and will consider using recycled aggregate for the embankments.* *6.7 The ES also states that a pre-demolition assessment of the highway structures has taken place so that consideration can be given to the reuse, recycling, or disposal of the materials.* *6.8 Lastly the scheme considered carbon removal through on-site peat restoration, but this was deemed unfeasible due to the poor standard of peat in place.*	
REP1-049ll	***Conclusion*** *6.9 Whilst the Council recognises that the scheme suggests that it will not in isolation have an impact on the national government's net zero target, the Council has a target of being carbon neutral by 2038 and takes into consideration the cumulative effect of carbon emissions, recognising that there is a need to reduce emissions as quickly as possible to reduce the negative impacts of climate change. As this scheme will increase greenhouse gas emissions both in the construction phase and the operation stage as outlined in section 14.10 of the ES it is the Council's view that this scheme will have a* ***negative*** *impact on greenhouse gas emissions and therefore climate overall.*	As set out in Section 14.1 of Chapter 14 Climate of the Environmental Statement [APP-053], the potential impact of the Scheme on climate (i.e. as a result of changes in emissions of greenhouse gases (GHGs)) 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 National Policy Statement for National Networks (NPS NN) (Department for Transport, 2024), as set out in Section 14.3 of Chapter 14 Climate of the Environmental Statement [APP-053]. 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. The Secretary of State uses the NPS NN as the primary basis for making decisions on Development Consent Order (DCO) applications. 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). 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*

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		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". 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**'. Furthermore, the Institute of Environmental Management (IEMA) guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022), states in Section 6.3 that "*A project that is compatible with the budgeted, science-based 1.5°C trajectory (in terms of rate of emissions reduction) and which complies with up-to-date policy and 'good practice' reduction measures to achieve that has a minor adverse effect that is* ***not significant****. It may have residual emissions but is doing enough to align with and contribute to the relevant transition scenario, keeping the UK on track towards net zero by 2050 with at least a 78% reduction by 2035 and thereby potentially avoiding significant adverse effects*" and "*For the avoidance of doubt, a 'minor adverse' or 'negligible' non-significant effect conclusion does not necessarily refer to the magnitude of GHG emissions being carbon neutral (i.e. zero on balance) but refers to the likelihood of avoiding severe climate change, aligning project emissions with a science-based 1.5°C compatible trajectory, and achieving net zero by 2050*". IEMA guidance on 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (IEMA, 2022) also 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 required by relevant guidance (DMRB LA 114) and policy (NN NPS), 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 with recent case law (R (GOESA Ltd) v Eastleigh Borough Council [2022] EWHC 1221 (Admin), Holgate J at 123 and 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.)
Geology and Soils		
REP1-049mm	*7.1 Geology and soils were assessed within Chapter 9 of the ES (APP-048) to*	The Applicant acknowledges Bury Metropolitan Borough Council's high-level summary of Chapter 9:

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	determine effects of the scheme based on information available at the preliminary design stage. This chapter outlines baseline conditions and potential impacts during construction. It also identifies mitigation measures recommended for any potentially significant adverse effects. Appendix 9.3 comprises a Ground Investigation Report. which presents the findings of three phases of site investigation and assesses the potential risks to human health and the environment. Desk study information was gathered during the 2018 Preliminary Sources Study Report (PSSR) with a further review being carried out of additional areas within the current, revised scheme boundary and presented within the ES overview.	Geology and Soils of the Environmental Statement [APP-048] and Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108]. The Applicant notes that, within the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18], Bury Metropolitan Borough Council concludes, at Issue Reference 6 and 7, that the desk study and site investigations allow them to be satisfied with the adequacy of the baseline conditions characterised across the Scheme.
REP1-049nn	***Context*** *7.2 Within the ES, baseline information was presented that had been gathered through a review of the available desk study information and the findings of existing ground investigation available for the study area.* *7.3 Historically, the study area has mainly comprised open land with limited past industrial uses. Three registered landfill sites are located within the vicinity of study area, as well as a number of small surface water features including Parr Brook, and Castle Brook.* *7.4 Approximately 132 exploratory boreholes and 67 trial pits have been excavated across the area of the proposed scheme as part of three phases of investigation between 2021 and 2023. Soil sampling, groundwater testing and ground gas monitoring has been undertaken, which included chemical testing of over 179 soil samples, 63 soil leachability samples and 31 groundwater samples.* *7.5 Made ground was found to be present across much of the area and was mainly associated with construction of the current motorway. The natural strata comprise mainly glacial till, locally overlain by alluvial and glaciofluvial deposits.* *Bedrock comprised Coal Measures where encountered. The Chester Formation, thought to be present towards the southwest was not encountered during the ground investigation. The ES assesses the potential risks to human health and the environment from presence of any contamination that may exist within the study area.*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of Chapter 9: Geology and Soils of the Environmental Statement [APP-048] and Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108]. For clarification, the total number of exploratory boreholes over the three phases of ground investigation was 67 boreholes (cable percussion boreholes and dynamic sampling boreholes); 65 windowless sampling boreholes and 15 hand excavated trial pits. This is based on the numbers provided in Section 3.3 of Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108]. The Applicant notes that, within the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [APP/7.18], Bury Metropolitan Borough Council concludes, at Issue Reference 6 and 7, that the desk study and site investigations allow them to be satisfied with the adequacy of the baseline conditions characterised across the Scheme, and at Issue Reference 8 that the human health risk assessment carried out for the Scheme appears reasonable.
REP1-049oo	***Summary of impacts*** ***Human Health*** *7.6 The soil analysis results have been compared to generic assessment criteria for commercial and industrial land use for chronic risk. Screening for acute risk was carried out using SoBRA's Acute Generic Assessment Criteria (AGAC). No elevated concentrations of contaminants were identified and consequently, the ES concluded that potential risks to site workers and adjacent residential were Low.* *7.7 The presence of asbestos in the form of loose Amosite and Chrysotile fibres was encountered in 4 samples of made ground located beneath the existing*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of Chapter 9: Geology and Soils of the Environmental Statement [APP-048] and Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108]. The Applicant notes that, within the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18], Bury Metropolitan Borough Council concludes, at Issue Reference 8, that the human health risk assessment carried out for the Scheme appears reasonable.

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	M66 (southbound) and M60 (eastbound and westbound) carriageways. Asbestos quantification analysis found concentrations of between <0.001% and 0.003%. The ES concluded that potential risks to site workers were considered Moderate, while to the risks to adjacent residents is considered Moderate to Low. An asbestos management plan will be put in place during construction in minimise any potential impacts. As a result, there is considered to be a ***neutral*** *effect with regard to soil contamination impact on human health with appropriate mitigation.*	
REP1-049pp	***[Summary of impacts]*** ***Controlled Waters – Groundwater and Surface Waters*** *7.8 Groundwater was mainly encountered within the glacial till deposits during the ground investigation. Exceedances of heavy metals, inorganic and organic contaminants within groundwater and soil leachability samples. The ES concluded that the risks to controlled waters were Moderate / Low because most of the exceedances were marginal, and the levels of the contaminants found could be representative of background concentrations. Additionally, the higher levels of exceedances seen in the soil leachability samples were not seen in the groundwater samples suggesting that soil leachability testing is overestimating the level contaminants that would be leachable. As a result, there would be a* ***neutral*** *effect with regard to impact on controlled waters.*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108]. The Applicant confirms that a controlled waters risk assessment has been carried out across the Scheme. The findings of that assessment are set out in Section 6.3 of Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108]. The Applicant notes that potential construction and operation impacts from the Scheme on controlled waters from soil leachate and groundwater contaminant exceedances are not considered significant and do not warrant any remediation to facilitate the Scheme. See Paragraph 9.8.10 and Paragraph 9.8.19 of Chapter 9 Geology and Soils of the Environmental Statement [APP-048]. The Applicant notes that, within the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18], at Issue Reference 9, it is agreed that the Site Water Conditions and Controlled Waters Risk Assessment are reasonable. It is also noted that there are no outstanding matters with the Environment Agency who are the regulator of controlled waters.
REP1-049qq	***[Summary of impacts]*** ***Ground Gas*** *7.9 Ground gas monitoring recorded elevated concentrations of methane and carbon dioxide with low flow rates within made ground and glacial deposits. However, no putrescible materials or significant potential sources of gas were noted within these deposits. The ES concluded that the risks to scheme and to adjacent properties from ground gas ingress was Low. However, potential risks site workers during the construction phase and future maintenance works was identified and would be mitigated by suitable health and safety measures. As a result, and with appropriate mitigation, there would be a* ***neutral*** *effect with regard to impact on human health from ground gas.*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of Appendix 9.3: Ground Investigation Report of the Environmental Statement Appendices [APP-108] and Chapter 9: Geology and Soils of the Environmental Statement [APP-048]. The Applicant notes that, within the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18], Issue Reference 10 considers in detail the ground gas monitoring, the Ground Gas Risk Assessment and the mitigations proposed within the Register of Environmental Actions and Commitments of the First Iteration Environmental Management Plan [REP1-010] and Appendix J: Outline Contaminated Land Management Plan [APP-137] of the First Iteration Environmental Management Plan [REP1-010]. It is agreed that Bury Metropolitan Borough Council are satisfied that the ground gas monitoring undertaken is acceptable and that residual constructions phase risks can be mitigated by suitable health and safety measures.
REP1-049rr	***Mitigation and enhancement*** *7.10 The Outline (First Iteration) Environmental Management Plan (EMP) includes measures to minimise any impact on human health and the environment during construction and is located in Appendix J. These measures include:* *• Asbestos management plan to detail the location of asbestos soil contamination, identify relevant duty holders, confirm the HSE licensing status of future works, and recommend asbestos control measures for future intrusive works.* *• Re-use of site won soils in accordance with the waste management regime and guidance set out within the CL:AIRE Definition of Waste: Development Industry Code*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of Appendix J: Outline Contaminated Land Management Plan [APP-137] of the First Iteration Environmental Management Plan [REP1-010]. The Applicant notes that, within the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18], Issue Reference 11 considers in detail the acceptability of the Appendix J: Outline Contaminated Land Management Plan [APP-137] of the First Iteration Environmental Management Plan [REP1-010] and how this will be secured through the Draft Development Consent Order [REP1-004]. It is agreed that the Applicant will consult with Bury Metropolitan Borough Council prior to submission of any remediation strategy to the Secretary of State for approval, and notes that where already

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	of Practice (DoWCoP). *• Re-use of soils/waste within Landfill 2 (also known as C099 M66 Costain, Simister Landfill) under appropriate waste recovery plan and bespoke environmental permit in consultation with the Environment Agency.* *• Dewatering and disposal activities to be carried out in line with appropriate permits/licences issued by the Environment Agency and United Utilities.* *• Piling risk assessment, if piles are proposed to penetrate the Chester Formation Principal Aquifer.* *• A watching brief / discovery strategy will be implemented during the development works to identified and deal with any previously unforeseen contamination.* *• Any excess unsuitable soil material to be disposed of at an appropriate waste disposal facility.* *• An asbestos management plan will be commissioned to detail the location of asbestos soil contamination, identify relevant duty holders, confirm the HSE licensing status of future works, and recommend asbestos control measures for future intrusive works.*	required by legislation a verification/completion report will be produced. Consultation with Bury Metropolitan Borough Council is secured by Requirement 6 of the draft DCO [REP1-004].
Green Belt		
REP1-049ss	*8.1 Relatively small areas of land to the west and south of M62 Junction 18 is designated as Green Belt.* *8.2 The proposed development does not meet any exceptions listed in Paragraph 154 or 155 of the NPPF. As such, the proposal is considered to represent inappropriate development in the Green Belt. Very special circumstances (VSC) would therefore need to be demonstrated which should outweigh the harm resulting from the proposal.* *8.3 The applicant lists the following VSC in the Case for the Scheme (APP-146):* *1. The need for the Scheme. This is to improve national infrastructure and is part of a national investment strategy for the SRN in England. This is consistent with the overall objectives for National Networks set out in the NPS NN and the Draft NPS NN.* *2. The benefits of the Scheme:* *• The Scheme provides future capacity for the forecast growth in traffic to deliver national networks which are resilient and meet the long-term needs. A key objective of the Scheme is to address the problem of congestion, which causes slow and unreliable journeys and reduces economic efficiency.* *• The Scheme would alleviate congestion that would otherwise worsen without the Scheme. As a result of the Scheme, this part of the SRN will operate within capacity up to and beyond 2044 and traffic using the Junction 18 would save up to 1.5 minutes compared to current journey times during normal traffic conditions.* *• The overall economic benefits of the Scheme provide a Present Value of Benefits of £137.5 million.* *3. The lack of alternatives with less impact on the Green Belt: Given that the purpose of the Scheme is to improve an existing section of the SRN, it is not possible to pursue an option which is outside the Green Belt, unless the surrounding motorway network is relocated entirely.*	Places for Everyone (PfE) was adopted in March 2024 and is now part of the statutory development plan for Bury. PfE has removed the land in the north-east of the Order Limits from the Green Belt and it is now allocated for the proposed Northern Gateway mixed use development. The amount of Green Belt land within the Order Limits has therefore reduced by 19 hectares, from 68 hectares to 49 hectares as result of PfE. The adoption of PfE means the saved Bury Unitary Development Policies relating to the Green Belt no longer apply to the part of the land within the Order Limits which has been removed from the Green Belt. As the Order Limits also includes the existing motorway infrastructure, which is already located in the Green Belt, this does not mean that 49 hectares of Green Belt land is developed and therefore lost as a result of the Scheme. Approximately 21 hectares of the Order Limits within the Green Belt comprises the existing motorway infrastructure. The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the 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 be within the Green Belt. The Case for the Scheme [APP-0146] sets out National Planning Policy for the Green Belt and concludes that the Scheme could harm the openness of the Green Belt. This assessment was undertaken prior to the adoption of PfE and therefore assumed that more of the Order Limits would be within the Green Belt. Whilst the Pike Fold viaduct introduces a new elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct is no longer within the Green Belt following its removal by PfE. The potential impact on the openness of the Green Belt is now mainly limited to the new or realigned link roads and attenuation ponds which reflect the existing use of the land as a motorway junction.

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	8.4 With the above points taken into consideration, it is considered that very special circumstances do exist which outweigh the harm to the Green Belt by way of the improvement to strategic national infrastructure, reduction in travel times and congestion, increase in capacity for forecasted growth and the resultant economic benefits.	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.
Historic Environment		
REP1-049tt	*9.1 There are no listed buildings within the draft Development Consent Order (DCO) limits and no part of the Order limits form part of a conservation area. There are Non-designated Heritage Assets (NDHAs) within the order limits identified through the Historic Environment Record (HER) and the Councils' draft Local List of Heritage Assets. There are historic hedgerows and known and potentially unknown archaeology. Watching briefs and Written Schemes of Investigate WSIs) are advised by the Greater Manchester Archaeology Advisory Service (GMAAS) and should be a requirement of the DCO where identified. GMAAS is the archaeological advisor to Bury Metropolitan Borough Council.* *9.2 The scheme assessment of impact on the cultural heritage of the Order limits and its conclusions, identifies that there would be no loss of heritage significance or significant harm caused to heritage assets or their settings.* *9.3 There would be **no significant harm to or total loss of significance** to any of the identified assets, notwithstanding mitigations, that would outweigh the public benefits of the scheme.* *9.4 Potential impact on archaeological interests relate to the treatment of below ground archaeological concerns across the footprint of the development, inclusive of the road corridors, and land-take associated with set-down compounds, loading areas, ponds/attenuation, and areas that may be stripped to accommodate temporary or permanent bunds of upcast spoil from groundworks. Impacts on built-heritage have also been included in the various assessments, identifying that no designated heritage assets will be directly/physically impacted by the scheme. Mitigation would be assessed by Bury Council.* *9.5 The cultural heritage desk-based assessment (DBA) (APP-045) is a detailed, well researched, useful and appropriate document providing a good overview of the scheme and assessment of various development impacts set against legislative and local policy. It makes use of appropriate datasets and analysis to establish the cultural heritage baseline for the development.* *9.6 The methodology for taking things forward as described in Section 1.4 of the DBA is broadly agreed, with Written Schemes of Investigation (WSIs) being provided for the various identified sites/areas. Paragraph 1.4.2 refers to trial trench investigations of two sites being monitored "…by an agent to be appointed by National*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of Chapter 6: Cultural Heritage of the Environmental Statement [APP-045] and Appendix 6.1 Cultural Heritage Desk Based Assessment of the Environment Statement Appendices [APP-081]. The Applicant accepts Bury Metropolitan Council's approach to investigation and mitigation of Non-designated Heritage Assets (NDHAs) under written schemes of investigation (WSIs) approved in advance of fieldwork by the Greater Manchester Archaeology Advisory Service (GMAAS). The Applicant notes that the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] sets out Bury Metropolitan Borough Council's position of agreement in relation to the following matters: • Issue Reference 17 on datasets used for cultural heritage baseline • Issue Reference 18 on agreement of approach for investigation in specific Historic Environment Record (HER) locations or areas with the potential to contain archaeological remains • Issue Reference 19 on agreement on areas to be excluded from trial trenching • Issue Reference 20 on mitigation relating to HER 3921.1.0, site of a possible oven/kiln • Issue Reference 21 on Unsworth Moss (HER 3878.1.0) and the potential for peat fringe landscapes to contain archaeological interest • Issue Reference 22 on use of qualified archaeological contractors • Issue Reference 23 on timing of archaeological evaluation/investigation • Issue Reference 24 on assessment of effect on heritage assets Within these issues there is agreement between the Applicant and Bury Metropolitan Borough Council as to the mechanisms within the draft DCO [REP1-004] to secure mitigation in relation to archaeology.

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	Highways", whilst paragraph 1.4.3 refers to a watching brief at one site being carried out "…by archaeological contractors on behalf of the Principal Contractor". *9.7 All archaeological work should be undertaken by suitably experienced and qualified archaeological contractor(s), funded by the applicant, and in accordance with guidance provided by the GMAAS, who would also monitor the implementation of the works on behalf of Bury Council and National Highways.* *9.8 All works should take place in accordance with methodologies outlined in appropriate WSIs, approved by GMAAS, in advance of the onset of archaeological works. The WSIs will provide methodologies for the whole archaeological project, including the fieldwork, post-excavation analysis, reporting and report deposition, dissemination of results commensurate with their significance (i.e. summary statement, short article in a local journal, or production of a booklet to summarise all works undertaken during the development schedule for publication as part of a popular series, i.e. the Greater Manchester's Past Revealed series), and final archiving of finds, records and reports.* *9.9 Whilst the DBA refers explicitly to sites that require investigation:* *• 1.3.5 – watching brief around potential oven/kiln (HER 3921.1.0) – agreed* *• 1.3.7 – evaluation of structures south of Mode Hill Lane (HER 3919.1.0) – agreed* *• 1.3.8 – evaluation of structures off Corday Lane (HER 3915.1.0) – agreed* *paragraph 1.2.8 also mentions the possible survival of historic soil horizons within in the north-west quadrant of the Order Limits (described as 50-100m NW of M60 J18 – the area that contains Pond 7 as shown in General Arrangement Sheet 2 of 5 (DCO Drawing No. TR010064/APP/2.2)). Works in this area that require stripping of the current land surface will require a scheme of archaeological work; undertaken to provide coverage across an area of unknown potential that will add context to our understanding of the area. This will require an agreed WSI and for works to take place prior to the onset of construction.* *9.10 The earlier that programmes of archaeological works can be completed in the development programme the better, as the results of evaluative works can be used to inform any further requirement for detailed excavation (subject to the significance of the initial results). All works would be undertaken in accordance with national policy as outlined in NPPF Section 16, Paragraph 211 - To record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.*	
Landscape and Visual		
REP1-049uu	*10.1 The Council agrees with the Landscape and Visual Impact Assessment Methodology (APP-082) and Landscape and Townscape Character Baseline and Sensitivity Assessment. Thereafter, the likely significant effects are set out in Appendix 7.3: Schedule of Landscape and Townscape Effects (APP-084) and Appendix 7.4:*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of the methodology, assessment and mitigation information for the landscape and visual impact assessment reported within the Environmental Statement and its appendices.

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	Schedule of Visual Effects (APP-085) of the Environmental Statement Appendices. *10.2 The identified embedded and essential mitigation and enhancement measures as set out at Chapter 7 of the Environmental Statement (APP-046). Whilst the embedded measures would reduce the effect from construction, the effects cannot be wholly mitigated due to the nature and extent of the scheme and* ***some adverse impact*** *would still be experienced. Therefore, essential mitigation would be incorporated to reduce effects and secured by Requirement 4 of the DCO.*	The Landscape and Visual Impact Assessment which is included in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] has considered the landscape and visual impacts from construction and operation of the Scheme. The detailed assessment of landscape effects is set out in Appendix 7.3 Schedule of Landscape and Townscape Effects of the Environmental Statement Appendices [APP-084]. The detailed assessment of visual effects is set out in Appendix 7.4 Schedule of Visual Effects of the Environmental Statement Appendices [APP-085]. Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] identifies that there would be significant adverse effects on landscape and visual receptors during construction, but that these significant adverse effects would reduce to not significant once mitigation planting has sufficiently established by year 15 of operation (except for at representative viewpoint 28, where significant adverse effects would remain, because at this location vegetation removed would not be reinstated in the M60 verge due to the narrowness of the remaining verge, and close proximity of the hard shoulder and drainage. Shrub planting would provide some amenity value although it would not be tall enough to provide any filtering or screening above the highway fencing). The environmental design has aimed to maximise opportunity for landscape integration and reduce the influence of the Scheme on people's views. The visual assessment has identified that there would be some beneficial effects (improvements on existing views) in some locations around M60 junction 18 as a result of the Scheme. The environmental design shown on Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-046] shows the location of mitigation planting to offset visual impacts and also to provide landscape integration of the Northern Loop. Figure 2.3: Environmental Masterplan shows an illustrative landscaping design. The landscaping design is secured by Requirement 5 of the draft DCO [REP1-004]. Requirement 5 (landscaping) prohibits any part of the authorised development commencing until a landscaping scheme for that part, covering all hard and soft landscaping works, has been approved by the Secretary of State following consultation with the relevant planning authority. The proposed landscaping scheme must reflect the relevant mitigation measures in the Register of Environmental Actions and Commitments (REAC), contained within the First Iteration Environmental Management Plan [REP1-010], and must be based on the illustrative Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-057].
Noise and Vibration		
REP1-049vv	*11.1 Noise and vibration were assessed within 6.5 First Iteration Environmental Management Plan - Appendix B (APP-129), outline noise and vibration management plan. This appendix sets out the measures that will be used by the Principal Contractor to manage noise and vibration generated by construction of the M60/M62/M66 Simister Island Interchange, which can affect residential occupants, users of non-residential noise and vibration sensitive buildings, settings of heritage sites and sensitive ecological sites and habitats.* ***Context*** *11.2 The Environmental Management Plan states that the construction and*	The Applicant notes Bury Metropolitan Borough Council's comments. The Applicant would like to clarify that Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] describes the findings of the noise and vibration assessment undertaken for the Scheme and the likely significant environmental effects of the Scheme during both construction and operation. Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] together with the First Iteration Environmental Management Plan [REP1-010] and Outline Noise and Vibration Management Plan [APP-129] set out the commitments and measures to mitigate noise and vibration impacts during construction. The Applicant notes the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue Reference 12 sets out agreement as to the methodology of the Appendix

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	operational noise and vibration assessment was undertaken at multiple sites along the proposed development.	11.3 Baseline noise survey results of the Environmental Statement Appendices [APP-111] and Issue Reference 13 to 16 sets out in detail Bury Metropolitan Borough Council's position of agreement in relation to the mitigation of noise and vibration impacts.
REP1-049ww	***Summary of construction impacts*** ***Noise*** *11.3 The assessment considered activities, equipment, noise emissions and distance of noise receptors:* *• Daytime (07:00 -19:00) there is a potential of 275 & 59 noise sensitive receptors which will be moderate and major impacted.* *• Nightime (19:00 – 07:30) there is a potential of 675 noise sensitive receptors which will be moderate and major impacted.* *11.4 The noise impact from construction works is considered to constitute a* ***negative impact****. However, this is temporary and would cease upon completion of construction. It is noted that the project is likely to take a significant number of years.*	The Applicant notes Bury Metropolitan Borough Council's comments. The Applicant would like to clarify that Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents an assessment of construction noise for the Scheme. The assessment takes into account the expected construction phases, equipment to be used and their sound emission as well as noise propagation and the position of receptors relative to the works. A summary of the total number of receptors where the SOAEL would be met or exceeded is given in Paragraph 11.10.15 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] and repeated in Table 11.39. There are a total of 275 receptors where the SOAEL is predicted to be met or exceeded (a moderate or major impact) during the daytime, and 647 in the night-time period. Commitment NV1 in the Register of Environmental Actions and Commitments, contained with the First Iteration Environmental Management Plan [REP1-010], is to develop and implement a Noise and Vibration Management Plan, which will set out the measures to mitigate noise and vibration impacts during construction. An Outline Noise and Vibration Management Plan can be found at Appendix B of the First Iteration Environmental Management Plan [APP-129]. This will be developed into the Noise and Vibration Management Plan as part of the Second Iteration Environmental Management Plan and secured by Requirement 4 of the draft DCO [REP1-004]. The noise impacts during the construction phase will result in an adverse effect. It should be noted that, although the total construction phase is three and a half years, works will not be constant in any given location for that time period. The works will be carried out in different areas at different times meaning that there will be periods of adverse impact for the receptors identified at different times, with periods when there is no impact.
REP1-049xx	***[Summary of construction impacts]*** ***Vibration*** *11.5 There are no identified major impacts of piling or compaction. There are 207 sensitive receptors that maybe moderately impacted, as identified in the First Iteration Environmental Management Plan - Appendix B. However, this could be tolerated, provided that there is clear communication in place by informing of the works and monitoring being in place. During the construction phase, the scheme would have a* ***negative*** *impact on those sensitive receptors. Requirement 4 would pertain.*	The Applicant notes Bury Metropolitan Borough Council's comments. The Applicant would like to clarify that Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] describes the findings of the noise and vibration assessment undertaken for the Scheme and the likely environmental effects of the Scheme, during both construction and operation. A summary of construction vibration impacts is presented in Paragraph 11.10.17 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-050] which confirms that 207 receptors are predicted to be subject to noticeable levels of vibration during piling or compaction. The effect is not considered to be significant considering the short duration of these activities in any location. Commitment NV1 in the Register of Environmental Actions and Commitments, contained with the First Iteration Environmental Management Plan [REP1-010], is to develop and implement a Noise and Vibration Management Plan, which will set out the measures to mitigate noise and vibration impacts during construction. An Outline Noise and Vibration Management Plan can be found at Appendix B of the First Iteration Environmental Management Plan [APP-129]. This will be developed into the Noise and Vibration Management Plan as part of the Second Iteration Environmental Management Plan and secured by

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		Requirement 4 of the draft Development Consent Order [REP1-004]. The Applicant notes the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] and that Issue References 13 to 16 set out in detail Bury Metropolitan Borough Council's position of agreement in relation to the mitigation of noise and vibration impacts. Issues Reference 14 specifically addresses the acceptability of the commitments of the First Iteration Environmental Management Plan [REP1-010] relating to communication during construction and how the mechanisms for securing this throughout the draft DCO [REP1-004].
REP1-049yy	***[Summary of construction impacts]*** ***Construction traffic and diversion routes*** *11.6 Diversion of traffic along new routes has not identified the potential noise receptors affected. Simple quantities, identifying the number of dwellings within 25m of a diversion route would be appropriate. Therefore, increased traffic on diversion routes would have a* ***negative*** *impact on those affected. Requirement 4 would pertain.*	The Applicant notes Bury Metropolitan Borough Council's comments. The Applicant would like to clarify that Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] presents an assessment of construction traffic and diversion routes during construction. The assessment includes identification of the diversion routes that are likely to be used and includes a count of the number of dwellings within 25m of each route, as presented in Table 11.27 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The Register of Environmental Actions and Commitments (REAC) in the First Iteration EMP [REP1-010] includes Commitment NV7 to keep to a minimum the number of full carriageway closures and associated use of diversion routes. Details regarding the management of construction activities and traffic are outlined in the First Iteration Environmental Management Plan [APP-127] and Outline Traffic Management Plan [APP-150]. The First Iteration Environmental Management Plan [REP1-010] will be developed into the Second Iteration Environmental Management Plan for implementation during construction and secured by Requirement 4 of the draft DCO [REP1-004]. The Outline Traffic Management Plan [APP-150] will be developed further into a Traffic Management Plan, secured by Requirement 10 of the draft DCO [REP1-004] which will further detail the specific traffic management measures to be implemented during construction. The Applicant notes that the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue Reference 39 sets out agreement with Bury Metropolitan Borough Council on the construction phase impacts on the local road network.
REP1-049zz	***[Summary of construction impacts]*** ***Temporary storage facility on Mode Hill Lane*** *11.7 The scheme proposes to locate a significant temporary storage facility accessed from Mode Hill lane. The land is presently unused. The site would be available 24 hours a day. Given the nature of the temporary intended use arising from site operations, trips accessing and egressing the site, residents in close proximity would be impacted from noise, vibration, light and dust. The use of this site would therefore have a* ***negative*** *impact.* *11.8 Due to increased vehicle movement on the access/egress road, the increased intensity and vehicle type is likely to cause surface damage/derogation. This could result in an increase in intermittent compact noise, compounding the* ***significant adverse effects*** *identified above.*	The Applicant has carried out an assessment of likely construction noise and vibration effects, as presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The results indicate that there will be adverse impacts from construction noise in the area of Mode Hill Lane during mobilisation and online works, which include both daytime and night-time working. 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 Applicant acknowledges that the operation of a temporary site compound during the construction phase will increase traffic on Mode Hill Lane. As noted above, the Applicant will appoint a community relations team who will be available throughout the construction of the Scheme to discuss concerns around noise and other disruption which may affect residents. Any issues relating to the condition of the local highway network will be discussed during the planned

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		regular engagement with the local highway authority. The Applicant notes that the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue Reference 39 sets out agreement with Bury Metropolitan Borough Council on the construction phase impacts on local road network. The Applicant notes further that the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue References 13 to 16 sets out in detail Bury Metropolitan Borough Council's position of agreement in relation to the mitigation of noise and vibration impacts. The Applicant notes the agreed position between Bury Metropolitan Borough Council and the Applicant in relation to the acceptability of the construction dust assessment, the mitigation and how this is secured, as set out in Issue Reference 1 in the Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18].
REP1-049aaa	***Summary of operational impacts*** ***Noise*** *11.9 The assessment acknowledges several variables that may increase or decrease road traffic noise levels at given receptor points and mitigation methods are implemented. There are no environmental barriers identified.* *11.10 Noise modelling indicates that the physical change, together with changes in road traffic flows and speeds have the potential to result in noise changes of a* ***minor*** *magnitude. However, these changes are* ***potentially significant*** *because existing levels of road traffic noise levels are above significant observed adverse effect level.*	The Applicant notes Bury Metropolitan Borough Council's comments. The Applicant would like to clarify the assessment of road traffic noise is presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. Mitigation measures for road traffic noise are discussed in Paragraphs 11.9.4 and 11.9.6 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050], and include the like-for-like replacement of the existing 1m high noise barrier alongside the M60 J18 clockwise off-slip road which will be removed to allow for the construction of the new M60 J18 clockwise free-flow link to the M66. A conventional low noise surfacing will be laid an all sections of carriageway within the pavement works for the Scheme, with the additional installation of a low noise surface with better noise reducing properties than a conventional low noise surface on all lanes of the M60 eastbound and westbound between M60 junction 17 and junction 18 as well as the free-flow link from M60 eastbound to M66 northbound. The outcome of noise modelling is summarised in Table 11.33 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050] for the opening year. Changes in road traffic noise of Negligible magnitude increases and decreases of less than 1 decibel (dB), are predicted for some receptors. Changes of this magnitude would not be noticeable to people and are not considered to be a significant effect, although it is accepted that receptors in the vicinity of the Scheme experience high levels of existing road traffic noise. There are also predicted decreases in road traffic noise at many more receptors of a Minor, Moderate and Major magnitude as a result of the Scheme. The Moderate and Major decreases in road traffic noise are a significant short term beneficial effect. The assessment also considers the long-term changes in road traffic noise. The outcome of the long-term assessment indicates changes in road traffic noise of Negligible magnitude increases and decreases of less than 3dB, which are not considered to be significant over the long term, resulting in no significant effects overall.
REP1-049bbb	***[Summary of operational impacts]*** ***Vibration*** *11.11 There are no anticipated vibration impacts during the operation of the scheme.*	The Applicant acknowledges Bury Metropolitan Borough Council's comment.
REP1-049ccc	***Mitigation and enhancement*** *11.12 There are both embedded (or design) and essential mitigation measures which*	The Applicant acknowledges Bury Metropolitan Borough Council's summary of the noise and vibration mitigation measures outlined in Chapter 11: Noise and Vibration of the Environmental Statement [APP-050]. Full details of embedded and essential mitigation measures and enhancement measures identified for the

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	have been incorporated into the scheme, summarised in the following table:	noise and vibration aspect can be found at Section 11.9 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-050]. These measures are included in the Register of Environmental Actions and Commitments, contained within the First Iteration EMP [REP1-010], and secured by Requirement 4 of the draft DCO [REP1-004].
Population and Human Health		
REP1-049ddd	*12.1 The chapters on Planning Policy, Geology and Soils and Noise and Vibration cover these matters.*	The Applicant notes the comment and refers to the Applicant's responses to the sections of the Local Impact Report on matters relating to Planning Policy, Geology and Soils and Noise and Vibration. The Applicant has undertaken an assessment of effects on population and human health; this is reported in Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. The human health assessment is a cumulative assessment that takes into account the combined effects on human health arising from interactions between environmental aspects, such as air quality (Chapter 5: Air Quality of the Environmental Statement [APP-044]), landscape amenity and lighting (Chapter 7: Landscape and Visual of the Environmental Statement [APP-046]), contamination (Chapter 9: Geology and Soils of the Environmental Statement [APP-048] and Chapter 13: Road Drainage and the Water Environment of the Environmental Statement [REP1-027]), and noise and vibration (Chapter 11: Noise and Vibration of the Environmental Statement [APP-050]).

Phase	Mitigation measure	Type of mitigation
Construction	BPM	embedded
	Appropriate selection of construction plant. Maintained and operated appropriately	embedded
	Audible reversing systems will have minimum noise impact	embedded
	Traffic management plan	embedded
	Development and implementation of community engagement plan, seeking to provide information about the proposal to a wide audience	embedded
	Use of low vibration piling methods where practicable	essential
	Use of temporary environmental noise barriers	essential
	Temporary rehousing and/or noise insulation for qualifying dwellings	essential
	During the noisiest phases of night-time works the aim will be to reduce adverse impacts to be below 10 or more nights in any	essential
	consecutive 15 nights, or below a total of more than 40 nights in any consecutive six-month period for noise levels above SOAEL at receptors, where practicable	
	Works will be planned to minimise the overall number of full carriageway closures required by aiming to carry out multiple works within planned carriageway closures	Essential
	The public will be kept informed of construction activities by newsletters, letter drops and liaison with the planning authority	essential
Operational	Design of proposal to minimise road traffic noise level	embedded
	Existing noise barriers will be replaced	embedded
	All lanes of the carriageway M60 J18 to M60 J17 will be resurfaced.	essential
	The new road surfaces with better noise reducing properties will have wider benefits to those outside the identified noise receptors	Enhancement

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Road Drainage and Water Environment		
REP1-049eee	*13.1 The scheme has potential impacts on several watercourses and existing water bodies, where existing outfalls for the current motorway layout already discharge. These will be impacted by additional impermeable areas of the Scheme, leading to increased discharge rates for some catchments.* *13.2 To mitigate this, discharge rates would be restricted to agreed rates comparable to existing rates and additional attenuation would be provided, utilising ponds, manholes and over-sized pipes, with discharge rates controlled by flow control devices upstream of outfalls. The indicative design satisfies the principles of the hierarchy of drainage options for discharge prioritisation.* *13.3 The Council are satisfied with the principles outlined in the Drainage Strategy (APP-122). The Council has been consulted during preparation of the report and has previously agreed discharge rates, general principles and constraints to be used in design.* *13.4 As a further agreed mitigation, updated climate change additions have been requested and utilised in design. This includes sensitivity testing with climate change of 40%, which indicates some areas of flooding up to 994m3. Further checks on exceedance flow paths should be applied as part of the final detailed design to confirm the level of any potential impacts in the most extreme storm events, but this is something which will need to be checked when the detailed scheme design is complete. Requirement 8 of the DCO would pertain.* *13.5 There will be **no adverse impacts** on the existing drainage network. The impact would therefore be **neutral**.*	The Applicant notes Bury Metropolitan Borough Council summary of the Drainage Strategy Report (Appendix 13.7 of the Environmental Statement Appendices [APP-122]). The Applicant confirms that the climate change scenarios considered within the Drainage Strategy Report (Appendix 13.7 of the Environmental Statement Appendices [APP-122]) have followed guidance outlined in the National Highways' Design Manual for Roads and Bridges CG 501 standard, and the latest Environment Agency guidance. This is noted in paragraphs 2.1.4 and 2.1.5 of the Drainage Strategy Report (Appendix 13.7 of the Environmental Statement Appendices [APP-122]): Paragraph 2.1.4 states: *'In accordance with DMRB CG 501, a climate change allowance of 20% is to be applied together with a sensitivity test which considers a 40% climate change uplift in peak rainfall intensity. However, based on the latest Environment Agency guidance (Environment Agency, 2022), a 30% climate change figure should be applied for the area in which the Scheme is located.'* Paragraph 2.1.5 goes on to state: *'Therefore, both climate change allowances (30% for design and 40% for sensitivity test) have been applied to the assessments of the drainage design and the assessment of the exceedance flow in a 100-year return period event.'* The Environment Agency guidance referenced is the 'Flood risk assessments: climate change allowances' (last updated 27 May 2022), available at the following link: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. The Applicant notes that the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue Reference 43 sets out the agreed position in relation to the drainage strategy and how this will be secured through the draft DCO [REP1-004].
Traffic, Transport and Access		
REP1-049fff	***Road Safety and Construction Traffic*** *14.1 Overall, it is considered the proposed development is much needed and would have a positive impact on the highway network of Bury. Whilst the development phase would have some impacts on the local road network in Bury, the Council would be fully consulted on diversion proposals and have the opportunity to consent to them. The rights of way affected would have alternatives provided, to an acceptable standard of finish.* *14.2 The negative impacts would include increased journey times on the local road network when there are either reductions or full closures on the M66/M60 during the construction period. The Transport Assessment (APP-149) for the scheme has modelled those increases/changes, which are **not considered substantial**. Once completed, the additional capacity achieved on the motorway network are expected to reduce queuing on the local road network, which is especially seen around Junction 17 M60 during peak traffic times, thus representing a **positive** impact.*	The Applicant notes Bury Metropolitan Borough Council comments that the Scheme "would have a positive impact on the highway network of Bury". The Applicant notes that the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue Reference 39 sets out agreement with Bury Metropolitan Borough Council on the Construction phase impacts on local road network. The Applicant further notes that traffic management during construction is considered in Section 9.3 of the Transport Assessment [APP-149]. The Applicant confirms that temporary traffic management arrangements have been phased and coded in the traffic model. Journey times are forecast to increase through the Scheme area by up to two minutes on certain routes. As a result, some traffic is forecast to divert onto other nearby routes to avoid these delays. However, the volumes of traffic changing route are not forecast to be significant enough to result in substantial changes in travel time on these alternative routes. The Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] sets out at Issue Reference 39 agreement with Bury Metropolitan Borough Council on

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	14.3 In addition, there are some details in the Outline Traffic Management Plan that would need to be considered further, though that is subject to liaison with and consent from the Local Highway Authority, as described in Schedule 2, Requirement 10 – Traffic Management. Requirements 4 and 10 of the DCO *14.4 National Highways would seek powers to have priority to work in some minor local streets adjacent to the development. They must act reasonably in such cases and given the overall benefits, and the need for such major developments to avoid delays, this is considered reasonable.* *14.5 Any works in a local road would be subject to the undertaker acquiring a New Roads and Street Works Act (NRSWA) permit, which will allow the Local Highway Authority to co-ordinate works on the local network.* *14.6 Requirements 4, 6 and 10 of the DCO would pertain.*	construction phase impacts on the local road network, the management of construction traffic through the Outline Traffic Management Plan [APP-150] and the relevant commitments in the First Iteration Environmental Management Plan [REP1-010], and how these measures will be secured within the draft DCO [REP1-004]. The Applicant notes that Requirement 4 and 10 of the draft DCO [REP1-004] require consultation with the relevant planning authority (Bury Metropolitan Borough Council) on matters relating to their function, prior to seeking approval from the Secretary of State to the Second Iteration Environmental Management Plan. The draft DCO [REP1-004] will further provide powers to the Applicant to undertake works on the local road network managed by Bury Metropolitan Borough Council as local highway authority. The exercise of these powers by the Applicant must be in accordance with the terms of the draft DCO [REP1-004], including Articles 10 and 11, as set out in the Applicant's response to the Action Points from ISH1 [REP1-024].
REP1-049ggg	***Strategic Transport*** ***Northern Gateway*** *14.7 Northern Gateway is identified in Places for Everyone (PfE) as one of the key growth locations that will help to deliver a central theme of the spatial strategy and deliver inclusive growth across the city region complemented by a key aim to boost the competitiveness of the northern parts of Greater Manchester.* *14.8 Northern Gateway straddles the districts of Bury and Rochdale and is positioned at a strategically important intersection around the M60, M62 and M66 motorways. It represents a highly accessible opportunity for growth in Greater Manchester with wider benefits on a regional and national level.* *14.9 The site is allocated for substantial employment-led development (JPA1.1). This would be supported by new communities within the site as well as at Simister/Bowlee (JPA 1.2), which have transformational potential in enabling new housing, community facilities and new transport infrastructure to come forward.* *14.10 Northern Gateway would deliver, an affordable and reliable public transport service, with active travel provision and enhancement providing a sustainable, connected network of travel routes, linking existing residential areas with new business premises and facilities, providing access to jobs and health and wellbeing benefits.*	The Applicant notes that the Northern Gateway will be accessed from the local road network (LRN) and that there will be alterations to the strategic road network (SRN) that will provide the new access arrangements. The Core Scenario used for modelling future traffic in the Transport Assessment (TR010064/APP/7.4) [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 (TR010064/APP/7.4). The other aspects of the Northern Gateway currently under consideration in Places for Everyone (PfE) are not included in the model. However, the implementation of the Scheme will provide sufficient additional SRN capacity to accommodate this should planning permission be granted in the future.
REP1-049hhh	***[Strategic Transport]*** ***Traffic Transport and Access*** *14.11 Improvements to the M60/M62/M66 interchange at Simister Island aligns with the Greater Manchester Transport Strategy 2040 (GMTS 2040) policy objectives,*	The Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [TR010064/APP/7.18] at Issue Reference 40-42 sets out agreement with Bury Metropolitan Borough Council on the Scheme's for permanent stopping up and diversion of footpaths, provision for the diversion of footpath 9WHI, and the process for diversions/extinguishments of Public Rights of Way.

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	which "aims to contribute to delivering sustainable economic growth, improve quality of life and protect the environment". The Simister Island proposal is identified on page 92 of GMTS 2040 as part of the suite of planned investment in Greater Manchester's Strategic Road Network which is described as key to the delivery of a more reliable northern highways network. *14.12 GMTS 2040 notes in relation to the Northern Gateway, the pressing need to improve the reliability of the M60/M62, improve the operation of Simister Island, improve access to/from motorway junctions (particularly at J3 of the M66, and J19 of the M60), and create new sustainable transport links to connect the area into adjacent residential areas and town centres as well as to the wider public transport network. These requirements have also been highlighted in the SRN analyses undertaken by GMCA and TfGM in liaison with National Highways, in support of PfE.* *14.13 GMTS 2040 also states: "Where we upgrade highways, we will include improvements for pedestrians, bus users and people who cycle". In the case of the Simister project, there are opportunities to improve and create safe walking and cycling connections across the motorway, reduce the severance effect of the road, connect communities with each other and with community facilities.* *14.14 However, a particular concern is the potential loss of walking and cycling connections during the works and the potential impact of displaced traffic upon the operation of the local road network and bus services. In case of the latter, it is of note that regular local bus services do travel through Simister Island, as well as on both parallel and crossing routes. It is therefore essential that the works are fully coordinated with the local Highway Authorities and TfGM to ensure disruption to travellers - both using and crossing the motorway, and the local community are minimised. Requirement 10 would therefore pertain.* *14.15 People who may be affected by any potential closures need to be made aware of any potential disruption well in advance and need to be provided with timely information on alternative travel options or routes. This includes potential impacts on the local, as well as strategic network, and on people walking, cycling or using public transport, who may be affected. Works should also be co-ordinated with other works planned on alternative routes and on the local road network.*	The Applicant has provided an assessment of the effects on walkers and cyclists in Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. Table 12.20 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051] provides details of the predicted impacts on specific routes during construction and outlines mitigation identified, with cross-references to the relevant commitments in the Register of Environmental Actions and Commitments (REAC) contained within the First Iteration EMP [REP1-010]. The REAC contained within the First Iteration EMP [REP1-010] sets out commitments to manage the impacts on public rights of way and local access (commitment references PHH4 and PHH7–12). No significant effects have been identified for walkers and cyclists during operation (Table 12.21 in Chapter 12: Population and Human Health of the Environmental Statement [APP-051]). Within the human health assessment in Chapter 12: Population and Human Health of the Environmental Statement [APP-051], the Applicant has provided an assessment of the effects on the wider determinant of health 'Connections to employment, services, facilities and leisure'. Paragraphs 12.18.28 – 12.18.31 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051] describe a slight negative (not significant) health effect for local communities during construction. Paragraphs 12.18.64 – 12.18.65 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051] describe a slight positive (not significant) health effect for local communities during operation. A reasoned narrative is provided for these significance conclusions in relation to population health which consider different modes of transport, including buses.
Summary		
REP1-049iii	*15.1 Bury Council welcome this development, which will significantly improve traffic flows at this key junction on the SRN, relieving congestion, and improving accessibility that would support the growth objectives for the nationally significant North East Growth Corridor and the wider Northern Areas.* *15.2 Cumulative effects, result from incremental environmental impacts caused by other developments together with the Scheme. They can occur during both construction and operation of a development. These are considered at Chapter 15 of*	The Applicant notes Bury Metropolitan Borough Council's summary and sign-posting to the cumulative effects chapter of the Environmental Statement [APP-054], and the mitigation identified therein. The Applicant notes that the 'Summary of Impacts' table set out in the Local Impact Report (LIR) [REP1A-001] should be read in conjunction with the relevant sections of the full LIR text. In addition, the significance of effect terminology used in the Applicant's Environmental Statement, which aligns with the significance categories provided in the National Highways' Design Manual for Roads and Bridges (DMRB) LA 104 Environmental assessment methodology standard, is provided in Table 4.8 of Chapter 4: Environmental

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the ES (APP-054).

15.3 The ES states no additional mitigation measures beyond those already identified within the relevant ES topic chapters, or the EMP and REAC, are considered to be necessary, as implementing mitigation for each individual effect would also serve to reduce the identified single project cumulative effects.

Summary of impacts

LIR Chapter	Construction/Operation Phase	Assessment of Impact
Planning Policy	Primarily operation	Positive
Air Quality Dust Emissions	Primarily construction	**Negative**
Construction Traffic	Primarily construction	Neutral
Human Health	Construction/Operation	Neutral/Positive
Designated Habitats	Primarily operation	Neutral
Biodiversity	Construction/Operation	Neutral
Climate	Primarily operational	**Negative**
Geology and Soils	Primarily construction	Neutral
Green Belt	Construction	**Negative**
Historic Environment	Construction	Neutral
Landscape and Visual	Primarily construction	**Negative**
Noise and Vibration Noise Vibration	 Construction Operation Construction Operation	 **Negative** **Negative** **Negative** N/A
Road Drainage and Water Environment	Construction/Operation	Primarily neutral/Neutral
Traffic, Transport and Access	Primarily construction	**Negative**

Assessment Methodology [APP-043]. The significance categories are very large, large, moderate, slight (adverse or beneficial) and neutral, with very large, large or moderate adverse or beneficial effects considered to be 'significant'. As this terminology differs from the assessment of impact categories used within the LIR [REP1A-001] it is not possible to draw a direct comparison between the assessment of impact categories used within the LIR [REP1A-001] and the likely significant effects reported in Chapters 5 to 16 of the Environmental Statement [APP-044 to APP-055; REP1-025; REP1-027].

The Applicant would furthermore clarify that:

- Dust emissions during construction: As stated in Paragraph 5.8.4 of Chapter 5: Air Quality of the Environmental Statement [APP-044], the construction dust risk is considered to be 'high'. However, as identified in Paragraphs 5.9.5 and 5.9.6 of Chapter 5: Air Quality of the Environmental Statement [APP-044], the Applicant has identified mitigation measures to control fugitive dust and avoid or reduce impacts from fugitive dust. These measures are included in Appendix A: Outline Air Quality and Dust Management Plan of the First Iteration Environmental Management Plan [APP-128]. The Outline Air Quality and Dust Management Plan will be developed into an Air Quality and Dust Management Plan as part of the Second Iteration Environmental Management Plan and secured by Requirement 4 of the draft DCO [REP1-004].

  Paragraph 4.10 of the LIR [REP1A-001] acknowledges that the 'negative' dust emissions impact during construction "*would be temporary and can be minimised through mitigation measures."* The Applicant concludes in paragraph 5.12.2 of Chapter 5: Air Quality of the Environmental Statement [APP-044] that there would be **no significant effects** resulting from construction dust with the construction phase mitigation measures included in the First Iteration Environmental Management Plan [REP1-010] in place.

- Green Belt: The Applicant notes that Places for Everyone (PfE) was adopted in March 2024 which has removed the land in the north-east of the Order Limits from the Green Belt. 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. 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 land in the Order Limits within the Green Belt comprises the existing motorway infrastructure.

  The impact of PfE is that the Northern Loop embankments, the Pike Fold Bridge structure (carrying the M66 southbound diverge link road over the Northern Loop), the M66 southbound diverge link road and pond 1 will no longer be located within the Green Belt. The other parts of the Order Limit surrounding the M60 and M66 remain in the Green Belt. This means that the M60 eastbound to M60 southbound interchange link (including the elevated structure of the Pike Fold Viaduct), the realigned southbound merge slip road, the realigned northbound slip road, pond 4 and pond 7 will still be within the Green Belt.

- The Case for the Scheme [APP-146] 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 land in the Order Limits would be within the Green Belt. Whilst the proposed Pike Fold viaduct introduces a new

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		elevated structure into the Green Belt, the impact of this on openness also has to be set against the context of the existing motorway infrastructure. Furthermore, the continuation of the highway infrastructure from the end of the Pike Fold viaduct will no longer be in the Green Belt. The Applicant consequently considers that the potential negative impact on the openness of the Green Belt is limited to the new or realigned link roads and attenuation ponds and that these are effectively an extension of the existing use of the land as a motorway junction. Noise during operation: As stated in Paragraph 11.12.2 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-050], during operation there would be significant beneficial effects for some receptors in the short-term. This is due to the use of a road surface with better noise reducing properties than a conventional low noise surface (LNS). However, in the long-term (i.e. 15 years after opening) the reduction in noise does not translate to significant beneficial effects, due to gradual increases in traffic growth over the time period, and an assumed reduction in performance of low noise road surfaces (paragraph 11.10.33 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-050]) and it is therefore concluded that there are **no significant effects** from the operation of the Scheme. Bury Metropolitan Borough Council is also referred to the Applicant's response to Paragraphs 11.9 and 11.10 (operational noise) of the LIR at REP1-049 of this table. • Vibration during construction: Commitment NV1 in the Register of Environmental Actions and Commitments, contained with the First Iteration Environmental Management Plan [REP1-010], is to develop and implement a Noise and Vibration Management Plan, which will set out the measures to mitigate vibration impacts during construction. An Outline Noise and Vibration Management Plan [APP-129] can be found at Appendix B of the First Iteration Environmental Management Plan. This will be developed into the Noise and Vibration Management Plan as part of the Second Iteration Environmental Management Plan and secured by Requirement 4 of the draft DCO [REP1-004]. With implementation of Commitment NV1 in the Register of Environmental Actions and Commitments, contained with the First Iteration Environmental Management Plan [REP1-010], the Applicant concludes at paragraph 11.10.19 of Chapter 11: Noise and Vibration of the Environmental Statement [APP-050] that **no significant adverse effects** are predicted from vibration during construction. Bury Metropolitan Borough Council is also referred to the Applicant's response to Paragraph 11.5 (construction vibration) of the LIR at REP1-049xx of this table. • Impacts on traffic, transport and access: The Applicant notes that in Paragraph 14.2 of the LIR [REP1A-001] it is stated that there would be negative impacts on the local road network during the construction period, however these are not considered substantial. The same paragraph identifies that during operation there would be a positive impact on the local road network. In addition, Paragraph 14.1 of the LIR [REP1A-001] states that, overall, there would be a positive impact on the highway network of Bury.