

M60/M62/M66 Simister Island Interchange

TR010064

7.24 WRITTEN SUBMISSIONS FOLLOWING NOVEMBER HEARINGS AND RESPONSES TO ACTION POINTS FROM CAH1 AND ISH2

APFP Regulation 5(2)(q)

Planning Act 2008

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

VOLUME 7

December 2024

Infrastructure Planning

Planning Act 2008

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

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

**WRITTEN SUBMISSIONS FOLLOWING NOVEMBER HEARINGS AND
RESPONSES TO ACTION POINTS FROM CAH1 AND ISH2**

Regulation Reference	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010064
Application Document Reference	TR010064/APP/7.24
Author	M60/M62/M66 Simister Island Interchange Project Team

Version	Date	Status of Version
P01	10 December 2024	Deadline 4

CONTENTS

1.	Introduction	1
1.2.	Compulsory Acquisition Hearing (CAH1)	1
1.3.	Issue Specific Hearing 2 (ISH2).....	1

Annex A: Applicant Responses to Action Points raised at Compulsory Acquisition Hearing CAH1 held on 26 November 2024

Annex B: Applicant Responses to Action Points raised at Issue Specific Hearing on Environmental Matters ISH2 held on 27 and 28 November 2024

Annex C: The Road to Good Design, Highways England (2018)

Annex D: Individual Land Plan for Plot 1/1a

1. Introduction

- 1.1.1. This document has been prepared to record the Applicant's written responses to the Compulsory Acquisition Hearing (CAH1) held on 26 November 2024 and the Issue Specific Hearing 2 on environmental matters (ISH2) held on 27 and 28 November 2024.

1.2. Compulsory Acquisition Hearing (CAH1)


- 1.2.1. The Action Points circulated by the Examining Authority arose directly from the CAH1 agenda [EV9-002]. In the circumstances where the identified action points are directly related to and arise from CAH1, the Applicant has incorporated its full written submissions into the Action Points attached at Annex A. The Applicant notes that members of the public attended the CAH1 and made oral representations. The Applicant will review any written submissions once available and reply, as necessary, at Deadline 5 of the Examination.

1.3. Issue Specific Hearing 2 (ISH2)

- 1.3.1. The Action Points circulated by the Examining Authority arose directly from the ISH2 agenda [EV10-002]. In the circumstances where the identified action points are directly related to and arise from ISH2, the Applicant has incorporated its full written submissions into the Action Points attached at Annex B. The Applicant notes that members of the public attended the ISH2 and made oral representations. The Applicant will review any written submissions once available and reply, as necessary, at Deadline 5 of the Examination.

Annex A: Applicant Responses to Action Points raised at Compulsory Acquisition Hearing CAH1 held on 26 November 2024

Action	Description	Action by	When	Applicant Response & Summary of Action taken
CAH1-1	Provide further details of the assessment of alternative transport modes undertaken during the early development of the Scheme.	Applicant	D4	<p>An assessment of alternative transport modes was undertaken during the early development of the Scheme. The assessment included evaluation of national rail, local light rail, buses, coaches and park and ride systems. The assessment concluded that there are no alternative transport modes which can reasonably solve the identified problems and meet the Scheme objectives.</p> <p>Notwithstanding the NPS NN, a standard part of the Applicant's scheme development process is to consider whether there is a viable alternative modal intervention that could solve the identified problems to the same degree as the proposed highway solution. That assessment identified that a wide variety of traffic movements from different geographies (local / regional / strategic) are being made for different purposes (personal / freight) within the Scheme area. Collectively these traffic movements contribute to the delays experienced. To achieve a similar level of benefit through mode shift to that delivered by the Scheme a significant reduction in traffic movements through the Scheme area would be required.</p> <p>Given the wide variety of traffic movements that use the Scheme area, any alternative mode solution would need to provide an attractive alternative for enough of these movements to generate the level of mode shift necessary to achieve similar benefits to the Scheme. This would therefore realistically need to consist of multiple modal alternatives, each targeted at a different demand market using the junction.</p> <p>It was therefore concluded that provision of such a package of modal alternative solutions would not realistically be a viable alternative to the proposed Scheme.</p>
CAH1-2	Provide details of what would be required to facilitate Pond 1 within the land enclosed by the proposed Northern Loop. The Hilary Family (represented by Mr Chris Stroud) to respond to the Applicant's submission at D5.	Applicant and the Hilary Family (represented by Mr Chris Stroud).	D4/D5	<p>The Applicant confirms that there are a number of blockers that fundamentally impact on the Applicant's ability to accommodate Pond 1 within the bounds of the Northern Loop. Below is a summary of those key blockers and issues that the Applicant would need to overcome in order to relocate the pond:-</p> <p>Fluid Hydraulics / positive drainage:-</p> <ul style="list-style-type: none"> For context, the low point of the Northern Loop shown on sheet 7 of 23 of the Engineering Section Drawings [APP-011], which forms part of catchment 1 (as shown in Figure 4-1 of Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]), drains into the pond at 91.664mAoD (metres above ordnance datum). As the geometry string used to inform the long section is on the outside of the loop and the loop has a 7% cross fall, falling to the inside of the loop, the lowest point of the pavement is actually 90.874mAoD. The outfall to Castle Brook, shown north east of Pond 1 on Sheet 2 of 5 of the General Arrangement Plans [APP-005] has a level of 89.142mAoD and this is driven by the level of the bottom of Castle Brook. The level difference between lowest point of the catchment and outfall level is therefore 1.732m. Considering that the pavement subsurface drainage also needs to drain positively and away from the pavement structure to prevent degradation of the pavement, and that the pavement thickness is approximately 950mm, then this also forms part of the overall drainage design and requires carrier drainage to be located below this. Based on the context of the design constraints and marginal level differences between the highway infrastructure and drainage outfall to Castle Brook, locating the pond inside the loop would require a pump. A pond inside the loop would exacerbate the longitudinal distance from the highway low point to the outfall to Castle Brook rendering a positive drainage solution unattainable. A pumped solution is not practicable due to whole life cost implications for the Scheme. Pumps have a high initial capital cost, they are more complex to design and result in a long term liability in terms of both operational and maintenance cost. The sustainability element of a pump is also not preferable in terms of the energy requirement, and overall carbon impact. Risk of failure of the pump is also a major concern and a risk that the Applicant is keen to avoid, pump failure potentially leads to a submerged road pavement, surface water flooding of the road surface or saturated road box which impacts on both operational safety of the Strategic Road Network (SRN) and can affect operational life of the pavement structure / embankment. It is also likely that due to the high water table, as determined by the findings of the ground investigation, and outlined in Appendix 9.3 Ground Investigation Report of the Environmental Statement [APP-108], the pump would also be pumping groundwater. <p>Geotechnical challenges:-</p> <ul style="list-style-type: none"> The topography of the pond 1 site within the loop could necessitate a deep excavation, these have their own Health & Safety (H&S) risks during construction which the Applicant has a duty to design out where practicable in line with relevant H&S legislation and principles of prevention, and would result in large volumes of waste material making construction more complex. Additionally, the poor ground established as part of the Geotechnical Investigation combined with a major cut / excavation close to the new embankment required for the loop poses a geotechnical risk and potential stability issues that could require significant additional ground improvement and geotechnical intervention to engineer a safe and sustainable solution. <p>Ecology / Habitat: -</p> <ul style="list-style-type: none"> The Pond location was also considered as part of the wider design harmony and therefore from an environmental point of view, the pond also provides habitat creation. Locating separate to the other environmental mitigation areas results in potential severance of habitat. With the installation of drainage attenuation Pond 1, there is also a requirement for landscape planting to integrate the pond into the local landscape and to maximise its benefit to biodiversity. The Applicant has achieved this through inclusion of marginal planting and wet grassland within the design. Although it is not a primary reason for its location, by siting the pond outside of the Northern Loop, there is an additional benefit to wildlife as the

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>pond is more accessible, whereas if it was positioned within the Northern Loop, it would then be fragmented by the highway, which would pose a barrier to wildlife using it.</p> <p>In summary, whilst the Applicant has considered the feasibility of locating Pond 1 within the Northern Loop, it has determined that, for the reasons cited above, when considered collectively, it is not practicable or cost effective to locate Pond 1 the pond within the Northern Loop.</p>
CAH1-3	Confirm the number of remaining unregistered plots listed in the Statement of Reasons [APP-018] and the work that is being undertaken to determine this information.	Applicant	D4	Where unregistered land forms part of an adopted highway managed by the local highway authority or by the Applicant as strategic highway authority, it may fall under their ownership. However, erring on the side of caution, it has been presumed that the ad medium filum rule might apply, meaning that the adjacent landowner is presumed to own the subsoil rights up to the midpoint of the highway. In total, 81 plots as shown on the Land Plans [REP3-004] and identified in the Book of Reference [REP3-008] fall within these categories. In addition to these, there are 12 other plots of unregistered land within the Order limits which are proposed to be permanently acquired permanently acquired as detailed in Table 4.1 of the Statement of Reasons [APP-018]. The Applicant refers to its previous response to the Examining Authority's first round of written questions in respect of the steps taken by it to try and determine the owners of the unregistered land (ref CA.1.3 [REP3-023]).
CAH1-4	Review plans in respect of Plot 1/1a and the extent of land illustrated to be acquired on the plans in comparison to that listed in the Book of Reference [REP3-008].	Applicant	D4	<p>The area of Plot 1/1a within the Order Limits is owned by the Applicant. Historically, and prior to the construction of the M60, the boundary of Plot 1/1a corresponded to the northern boundary of properties immediately adjacent to "Yorkshire Road".</p>  <p>The Applicant, when it was the Highways Agency, acquired properties in this area. As a result, the Order Limits now appear to extend into residential properties that were previously adjacent to Yorkshire Road. Please see plan provided in Annex D for clarity on the title boundaries. Additional titles outside the Order limits have been shown on the plan to provide context.</p>
CAH1-5	Supply further details to explain why Plots 2/1aw and 2/1av are required to deliver the scheme.	Applicant	D4	The Applicant confirms that Plots 2/1aw and 2/1av comprise part of the private road known as Egypt Lane. The plots are within the freehold ownership of the Applicant. The Applicant requires the ability to pass and repass over Egypt Lane in order to undertake the Scheme. Whilst the Applicant can pass and repass over its own land, Plots 2/1aw and 2/1av are subject to other third-party Category 1 and 2 interests as identified in the Book of Reference [REP03-

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				008]. To ensure that the Applicant can use Egypt Lane without constraint from any third-party interests, it has erred on the side of caution and included its own land as being subject to compulsory acquisition. This approach is consistent with the approach generally adopted by the Applicant in respect of the compulsory acquisition of its own land. It is also consistent with the approach adopted on other made DCOs.
CAH1-6	Consider whether provision could be added to the draft Development Consent Order (dDCO) to more precisely restrict the time limit required to temporarily possess gardens located adjacent to the M60 to the minimum time necessary.	Applicant	D5	
CAH1-7	Consider whether provision could be added to the dDCO to more precisely restrict the time limit required to temporarily possess Plots 1/5aq and 1/5as to the minimum time necessary.	Applicant	D5	
CAH1-8	Provide further detail in respect of why land is required for plots in locations which are white on the land plans. Also consider if Note 5 on the Works Plans should be revised to include reference to Environmental Statement Chapter 2 Figures.	Applicant	D4	<p>There are several land plots where the Applicant requires temporary possession as shown on the Temporary Works Sheets 1 to 5 of the Chapter 2 The Scheme Environmental Statement Figures [APP-057]. Whilst the Applicant has not defined temporary activities in some areas on these plans, these are important areas of temporary possession which are required to allow the undertaking of the permanent works and ensure the Applicant can achieve the relevant actions and commitments identified within the Register of Environmental Actions and Commitments of the First Iteration Environmental Management Plan (TR010064/APP/6.5 P04).</p> <p>The following list identifies land plots containing white space and sets out the need for the Applicant's temporary possession requirements:</p> <ul style="list-style-type: none"> Plots 2/3c and 2/8b (as shown on the Land Plans [AS-005]) off Corday Lane within the southwest quadrant. These plots are required for the construction of Pond 4 and widening of the carriageway of the M60. Part of the requirement for these plots is to facilitate activities (l), (n) and (p) of the ancillary works within Schedule 1 the draft Development Consent Order [REP3-006]; notably the establishment of storage areas, temporary vehicle parking, construction fencing, perimeter enclosure, security fencing, machinery and pumping for the purposes of dewatering excavations and the management of surface water. The temporary working area is very constrained within the southwest quadrant considering the footprint of permanent works, proximity to mainline M60, and the requirement for space for temporary storage of earthworks materials. Plots 2/3c and 2/8b (as shown on the Land Plans [REP3-004]) will be required to provide sufficient space for the maneuvering of construction plant and short-term storage of drainage materials/plant/equipment when constructing the permanent works. This land will also be utilised for the establishment of temporary water management installations, sediment/pollution control measures and temporary site drainage to ensure achievement of commitments W1, W13, W21 and W29 within the Register of Environmental Actions and Commitments of the First Iteration Environmental Management Plan [REP3-014]. The temporary possession requirement extends to the boundary of St Margaret's School to allow the Applicant to inspect the existing boundary fence and install additional boundary fencing if necessary to ensure a secure site perimeter segregating the school playing fields from the site. The plots here may be used to provide a temporary screening bund to the residential dwellings on Corday Lane to screen them from the works in line with commitment NV8 within the Register of Environmental Actions and Commitments of the First Iteration Environmental Management Plan [REP3-014]. Plots 2/3c and 2/8b (as shown on the Land Plans [REP3-004]) are required in relation to ancillary work (f) within Schedule 1 of the draft Development Consent Order [REP3-006], specifically to place a temporary technology duct around the perimeter of the site to maintain the Applicant's motorway communications network during the construction phase. Plot 2/5b (as shown on the Land Plans [REP-004]) located off Mode Hill Lane in the Northwest Quadrant. As shown within Temporary Works Sheets 1 to 5 of Chapter 2 The Scheme Environmental Statement Figures [APP-057], this plot is required for the provision of a temporary construction compound and the storage of materials and stockpile areas. There is an area of white space identified to the west of the plot which the Applicant requires temporary possession over to undertake ancillary works (f) and (n) identified within Schedule 1 of the draft Development Consent Order [REP3-006]. This includes temporary working areas which will be required for the placement of any new utilities from Mode Hill Lane into the site compound. Plot 2/5b as shown on the Land Plans [REP3-004] is required for the establishment of the site compound and associated infrastructure. The access to the main compound is shown indicatively on the Temporary Works Sheets of the Scheme Environmental Statement Figures [APP-057] and is located within the white space of the plot. The poor ground conditions identified within the Northwest Quadrant mean that there is a need to maintain some flexibility of temporary material stockpile locations; for example, and in line with commitment M7 within the Register of Environmental Actions and Commitments of the First Iteration Environmental Management Plan [REP3-014], allowing some of the white space to be utilised for temporary storage should pockets of peat be identified where there is a preference for it to be left undisturbed if feasible. Plot 4/8b (as shown on the Land Plans [REP-004]) located adjacent to Pond 2 off Griffie Lane. The Applicant requires temporary possession over this land plot to facilitate lettered works (f), (n) and (p) of the ancillary works associated with Works No. 43, 44 and 47 (as shown on the Works Plans [AS-006]) of Schedule 1 of the draft Development Consent Order [REP3-006]. This includes provision to undertake works during

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>construction to protect and maintain the position of existing drainage which runs through plot 4/8b (as shown on the Land Plans [REP3-004]) to Castle Brook. The Applicant also requires plot 4/8b (as shown on the Land Plans [REP-004]) for the establishment of site construction compounds and temporary material storage areas required for construction of Pond 2 and all associated drainage infrastructure. Whilst constructing the ponds and associated drainage, temporary water management will be required in the form of temporary pumping and pollution control installations installed within the footprint of plot 4/8b following existing drainage and accessing the existing Castle Brook Outfall. The temporary possession of this land is necessary to ensure the achievement of commitments C4, W1, W21, W29 and W30 within the Register of Environmental Actions and Commitments of First Environmental Management Plan [REP3-014].</p> <p>The Applicant will update Note 5 on the Works Plans at Deadline 5 to include reference to Environmental Statement Chapter 2 Figures.</p>
CAH1-9	Review the accuracy between the Book of Reference [REP3-008] and the Land Plans [REP3-004] with respect to plots of land where only new rights are to be acquired.	Applicant	D4	The Book of Reference has been reviewed and a revised version submitted at Deadline 4 (TR010064/APP/4.3 P04).
CAH1-10	Review the Book of Reference [REP3-008] to address any outstanding errors.	Applicant	D4	The Book of Reference has been reviewed and a revised version submitted at Deadline 4 (TR010064/APP/4.3 P04).
CAH1-11	Respond to comments in [REP1-045] regarding Article 2 of the Human Rights Act and why it has not been referred to in the Statement of Reasons [APP-018].	Applicant	D4	<p>Article 2 of the Human Rights Act 1998 provides for the right to life namely:</p> <p>(1) Everyone's right to life shall be protected by law. No one shall be deprived of his life intentionally save in the execution of a sentence of a court following his conviction of a crime for which this penalty is provided by law.</p> <p>(2) Deprivation of life shall not be regarded as inflicted in contravention of Article 2 when it results from the use of force which is no more than absolutely necessary: (a) in defence of any person from unlawful violence, (b) in order to effect a lawful arrest or to prevent the escape of a person lawfully detained, (c) in action lawfully taken for the purpose of quelling a riot or insurrection.</p> <p>The Applicant has not referred to Article 2 in the Statement of Reasons [APP-018] because the Applicant does not consider that the Scheme will interfere with or infringe on any person's Article 2 rights. The Scheme alone will not deprive anyone of their life or affect anyone's life expectancy.</p> <p>The Applicant has further actively considered the impacts of the Scheme on those affected by it as evidenced in Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. The concerns about the impacts on human health from air pollution are addressed in the Applicant's response to the comments in [REP1-045] as set out in the Applicant's Responses to Deadline 1 Submission [REP2-007].</p>
CAH1-12	Check and confirm if there is any precedent for vesting rights for the benefit of statutory undertakers or any other person in any other made Development Consent Order and supply further evidence on why it is necessary for this Scheme	Applicant	D4	<p>Article 24(1) of the draft Development Consent Order [REP3-006] provides for rights and restrictive covenants as may be required for the Scheme to be acquired or imposed by the Applicant over land which it is authorised to acquire under article 21. This allows the Applicant to create new rights over any of the Order land and this extends to the creation of rights for the benefit of third parties, such as statutory undertakers who may require rights of access and maintenance to be granted to them in respect of apparatus being diverted as part of the Scheme. This provision has precedent in the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022 (article 22) and the Lake Lothing (Lowestoft) Third Crossing Order 2020 (article 26).</p> <p>The Article 24(1) power ensures that the Applicant has the ability to create rights over land for statutory undertakers and other persons who require those rights to undertake, operate and maintain the Scheme. The scope of the rights will not change, merely those where that can exercise the rights. There is therefore no additional burden placed on the landowner. If all the necessary rights cannot be secured for statutory undertakers and other persons, then delivery of the Scheme could be compromised. This is because statutory undertakers might not be willing to undertake the necessary diversion works to their apparatus if they do not have certainty that the necessary replacement rights will be available to them. Similarly, the ability of other persons to enjoy their land post construction of the Scheme might be compromised if they do not have the necessary rights (for example, if a replacement right of drainage, connection into services or alternative right of access cannot be provided).</p> <p>If the power does not provide for rights to be created in this way, then the Applicant will have no alternative but to acquire the land permanently. This would be disproportionate to the landowner and unnecessary given that there a way forward can be secured in the draft Development Consent Order which balances the needs of the Scheme and the harm to the landowner.</p>
CAH1-13	Review the scope of the wording in Article 30(9)(a) and the plots listed in Schedule 7 of the dDCO as to whether all plots require the option of acquiring	Applicant	D5	

Action	Description	Action by	When	Applicant Response & Summary of Action taken
	new rights that would be granted under Article 30(9)(a)			
CAH1-14	Provide further justification for Article 30(9)(a) in light of the Secretary of State's decisions in respect of similar provisions proposed in articles on both the made 'M3 Junction 9 Development Consent Order 2024' and 'The A1 Birtley to Coal House Development Consent Order 2021'.	Applicant	D5	

Annex B: Applicant Responses to Action Points raised at Issue Specific Hearing on Environmental Matters ISH2 held on 27 and 28 November 2024

Action	Description	Action by	When	Applicant Response & Summary of Action taken
1	Provide in writing the evidence supplied orally during the hearing detailing the benefits beyond the those included within the Benefit to Cost Ratio (BCR) and confirm whether there are any other indirect benefits from the Scheme aside from supporting the allocations within Places for Everyone (Pfe) Joint Development Plan.	The Applicant	D4	<p>The national need for investment in the Strategic Road Network is set out in paragraph 2.13 of the 2015 National Policy Statement for National Networks (NPS NN), which states that a well-functioning Strategic Road Network is critical in enabling safe and reliable journeys and the movement of goods in support of the national and regional economies. Specifically, the following are the primary impacts of the Scheme that have been assessed and included as part of the BCR calculation:</p> <ul style="list-style-type: none"> • Transport user benefits: improved journey times and impact on vehicle operating costs; • Indirect tax impacts; • Noise; • Air quality and greenhouse gas impacts; • Safety impacts; • Delays during scheme construction; • Journey time reliability improvements; and • Benefits associated with wider economic impacts: <ul style="list-style-type: none"> ○ Agglomeration: productivity benefits due to reduced travel time between businesses. ○ Tax revenues arising from labour market impacts – reduced commuting costs can result in increased participation in the labour market. ○ The increased output from imperfectly competitive markets impacts – a reduction in generalised travel cost will induce investment and hence output Construction and maintenance costs <p>Whilst the Scheme adjusted BCR of 1.17 is classed as 'low' it still represents a positive return on investment and Scheme value for money is more than just the BCR value. In particular it is worth noting that the Scheme BCR does not account for benefits associated with Pfe traffic as following DfT's TAG guidance results in development sites within Places for Everyone (Pfe) being classed as too uncertain to include in the core traffic forecasts and economic assessment.</p> <p>Other benefits not included in the BCR are therefore the residual capacity to accommodate potential additional traffic in the scheme area associated with Pfe. Specifically, policy JP-STRAT 6 at paragraph 4.50 (page 58) sets out that the most significant proposed economic intervention in the northern areas is focused along the M60 and M62 corridor from Junction 18 of the M60 to Junction 21 of the M62 across Bury, Rochdale and Oldham incorporating the Atom Valley Mayoral Development Zone. Paragraph 10.51 of Pfe (page 224) states that planned improvements at Simister Island are vital in ensuring that the Strategic Road Network in Greater Manchester operates in an effective and efficient manner and best contributes to sustainable economic growth and figure 4.6 of Pfe (page 62) includes an annotation showing the Junction 18 improvements. The Scheme therefore supports wider economic growth aspirations of the region.</p> <p>Furthermore, the following additional benefits of the Scheme are not included in the BCR:</p> <ul style="list-style-type: none"> • Improving journey quality by reducing driver stress associated with delays in the Scheme area. Making the M60 free flow in the clockwise direction also improves journey quality and reduces complexity for drivers making this movement as they no longer need to pass through a roundabout and traffic signals to remain on the M60 motorway • Some benefits also accrue to bus services that pass through M60 J18 such as the X43 <p>Supporting regeneration, especially of the South Heywood area, the Applicant considers that the Scheme is required as the long term solution for the congestion and delays currently experienced at Simister Island Interchange as well as for supporting the economic development aspirations of Greater Manchester. Without the Scheme in place, these benefits will not be realised. Beyond Pfe, Bury Metropolitan Borough Council has an economic strategy 2024-2034. This includes reference to the importance of the Northern Gateway and the Atom Valley Mayoral Development. Page 23 of this strategy highlights that "to unlock the Northern Gateway, its growth potential and to maximise socio-economic benefits and Greater Manchester net zero ambitions, significant new transport and other infrastructure investment will be required to meet future demand generated by the site, as well as ensure employment opportunities are accessible to local residents.</p>
2	Provide detail of the BCR and describe the benefits for the inner links option in comparison to Northern Loop.	The Applicant	D4	<p>The Applicant confirms that, at the Option Selection stage of the Scheme's development, two options were consulted on as part of the Options Consultation undertaken between June and August 2020. The two options were the Northern Loop and Inner Links. Since the completion of the Option Selection stage of the Scheme in 2020 and the selection of the Northern Loop as the preferred option, there have been a number of updates to the traffic model, development of the Scheme design, review of the Scheme costs and updates to DfT's traffic and economic growth forecasts. This means it is not possible to provide a BCR for the Inner Links that is consistent or comparable with the current Northern Loop adjusted BCR of 1.17 as no further assessment of the Inner Links option has been carried out since the Preferred Route was announced due to it not being the preferred option for the</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>Scheme. However, for reference, at the time of the Preferred Route Announcement the adjusted BCR for the Northern Loop was 2.76 and for Inner Links was 2.46.</p> <p>As noted in the Preferred Route Announcement (see Annex B of the Consultation Report Annexes) [APP-023] the Northern Loop option was selected as the preferred option for the following reasons:</p> <ul style="list-style-type: none"> ○ Preferred by members of the public (67% vs 24% Inner Links) and many key stakeholders ○ Greater capacity and journey time improvement, for longer ○ Considered to be the safer of the two layouts ○ Less complex to construct with less intrusive roadworks ○ Less confusing for drivers to navigate ○ Overall represents better Value for Money <p>For the reasons outlined above, the Applicant considers it is not possible to quantify the capacity improvements and longevity of the benefits of the Inner Links in a manner consistent with current traffic modelling assumptions which is based on the Northern Loop only. However, at the Options Selection stage (which different forecast years) the following conclusions were reached on the capacity and longevity of the two options:</p> <ul style="list-style-type: none"> ○ The Inner Links Option provided spare capacity for most movements at opening (assumed to be 2023 at the time of assessment) apart from M66 SB – M60 WB in the PM peak. However, by 2038 (design year at the time of assessment) there was very little spare capacity for any movement in the AM and PM peaks with the situation deteriorating further by 2051 (the horizon year at the time of assessment). All four right turn movements at J18 would continue to use the roundabout with the Inner Links option and the increase in capacity is constrained. ○ The Northern Loop Option provides a significant increase in capacity for the M60 clockwise movement which will utilise the new free flow loop. As a result of this movement being removed from the roundabout there are increases in available capacity for the other three movements that remain on the circulatory as an opposing movement is removed. ○ The spare capacity available indicates that with the Northern Loop Option there is spare capacity available for all four turns through the junction in all three forecast years (2023, 2038 and 2051) and time periods apart from the M60 NB – M62 EB movement in the PM peak in 2051. <p>The traffic modelling work undertaken prior to the DCO application (2023) for the Northern Loop option indicates that the Scheme area is forecast to operate within capacity up to the latest horizon year of 2061.</p>
3	Provide an update to the cumulative assessment following submission of a scoping opinion in PfE JPA.1.1 site allocation and any other known developments.	The Applicant	D5	
4	Consider if sensitivity tests should be revisited in respect of PfE Northern Gateway site allocations.	The Applicant	D4	<p>In accordance with the DfT's TAG guidance, development sites within Places for Everyone (PfE) are classed as too uncertain to include in the core traffic forecasts. Only development sites that have a submitted or imminent planning application are required to be directly included in the forecasts.</p> <p>As noted under Agenda Item 2 above, an assessment of spare capacity at M60 J18 forecasts that by 2061 there will still be residual capacity for all movements at the junction with the Scheme in place. Conversely, with the existing layout, certain movements at the junction are already at capacity during peak times. Whilst there is a high degree of uncertainty with regards to the exact level of traffic generation due to PfE, and in particular the changes in flows at M60 J18, it is clear that the existing layout would not be able to accommodate this additional traffic, whereas, with the Scheme in place, there is residual capacity to accommodate additional traffic growth.</p> <p>Whilst no sensitivity testing has been carried out based on the recently emerging additional information about PfE sites, sensitivity testing has previously been carried out in the traffic models using information provided by Transport for Greater Manchester (TfGM) in 2021 with regards to the Northern Gateway aspect of PfE. TfGM had run scenarios in the Greater Manchester strategic model (GMVDM) which included traffic from PfE sites and the assumed transport infrastructure enhancements required to mitigate the impact of this traffic (which included the M60 J18 Simister Island scheme). The Applicant's sensitivity testing involved developing forecast scenarios in its model including these additional transport infrastructure improvements and the Northern Gateway site traffic. Scenarios were developed with and without the Scheme. Results indicated that without the Scheme in place, the additional traffic from Northern Gateway resulted in increased delays in the Scheme area. With the Scheme in place, these delays were reduced and the Scheme area largely operated within capacity in all time periods and for all movements even up to 2061. Whilst there is a high degree of uncertainty surrounding the ultimate traffic generation for the PfE sites, and how many of the additional transport infrastructure improvements will be funded and delivered, the Applicant believes that the modelling work undertaken provides confidence that the Scheme provides a significant betterment over the existing layout in terms of the network's ability to accommodate PfE traffic.</p> <p>Given ongoing uncertainty with regards to the exact levels of PfE traffic generation and the impact and delivery of complementary transport infrastructure improvements, it is not feasible to run meaningful additional sensitivity tests at this time. It is considered that the previous sensitivity testing and the residual capacity analysis provides sufficient evidence in terms of the Scheme's interaction with PfE traffic.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
5	Submit a copy of the National Highways 'The Road to Good Design'.	The Applicant	D4	A copy of the National Highways guidance document entitled "The Road to Good Design" is provided in Annex C of this document.
6	Provide details how the design of the Scheme meets the 'Design Principles for National Infrastructure', published by the National Infrastructure Commission (February 2020).	The Applicant	D4	<p>The Applicant has applied National Highways' design principles set out in the Road to Good Design and the assessment can be found in the Scheme Design Report [APP-151]. The Applicant has also had regard to the need to comply with established technical standards within the Design Manual for Roads and Bridges (DMRB). The Road to Good Design sets out ten design principles which align with the Criteria for Good Design in the relevant National Policy Statement and with the National Infrastructure Commissions (NIC) four design principles of climate, people, places and value.</p> <p>In the Applicant's response to the Examining Authority's Rule 9 Procedural Decision [PD-005] dated 17 June 2024, the Applicant set out how the Scheme aligns with the NPS NN 2024 and the NIC four design principles as follows:</p> <p>People:</p> <p>The Scheme design has followed extensive collaboration, consultation and is inclusive. This is demonstrated by the Consultation Report [APP-021] and the Equalities Impact Assessment [APP-152].</p> <p>The design has been developed in line with DMRB by an integrated team of engineering, built environment and environmental specialists appointed by the Applicant.</p> <p>The overarching principle is that the new infrastructure is as safe possible. For example, it incorporates a hard shoulder except where land requirements or physical obstacles have not allowed this.</p> <p>The signage and gantries have been designed to direct traffic efficiently and safely through the network in line with the DMRB.</p> <p>Places:</p> <p>The design fits into the local context and is environmentally sustainable as shown on the Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057]. For example, the design incorporates environmental mitigation which includes woodlands and grassland habitats and tree and shrub species which in combination provides similar or improved habitat type to any vegetation that is removed.</p> <p>The landscaping is designed to take account of the formerly designated Special Landscape Area. For example, carefully designed groups of trees and shrubs help integrate into the surrounding vegetation pattern. The embankments gradients for the Northern Loop have been reduced to help the road integrate into the landscape setting. The mitigation has been specifically sighted to maximise its effectiveness. For example, the environmental mitigation around the northern loop has been designed to enable established wildlife corridors to continue to function and to minimise the potential for impacts on protected species, particularly bats. Therefore, the design has responded to the geographically specific elements of the surrounding environment to ensure these are preserved or replicated as far as it is practicable.</p> <p>Climate:</p> <p>The design is resilient to climatic variations, for example the Sustainable Urban Drainage (SUDs) 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%. The road surface and structures are designed to withstand extreme heat or cold.</p> <p>Value:</p> <p>The Main Contractor appointed by the Applicant is part of the design team to ensure that the design is constructable and that the most cost-effective solutions are used. For example, an overall design ethos has been to minimise land take. In terms of materials, the bridge decks are designed to be long lasting with an intended design life of 120 years.</p> <p>The outcome of this design process is a combination of alterations to the existing motorway infrastructure and the introduction of new or improved free flow links at Junction 18 of the M60 which incorporates sustainable and environmental design measures as well as ensuring it is resilient to variations in the climate.</p>
7	Explain why not all comments received during the statutory consultation in respect of design were taken into account.	The Applicant	D4	<p>The Applicant confirms that all comments received during Statutory Consultation, including those in relation to design, were fully appraised, considered and taken into account. This is outlined in Tables 5-14 and 5-15 of Chapter 5 of the Consultation Report [APP-021] and detailed extensively in Annex Q of the Consultation Report Annexes [APP-038].</p> <p>In Table 5-14 of the Consultation Report [APP-021], the Applicant outlines how changes were made to the Scheme design following comments received by respondents to the Statutory Consultation. Furthermore, Table 5-15 provides justification as to why further design changes were not made to the Scheme design based on the key themes raised by consultees. The Applicant accepts that there are a lot of themes outlined in this table, which was due to the nature of the wide range of responses received to the consultation. However, typically, the reasons for not taking forward design changes suggested by consultees relate primarily to one of the following:-</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<ol style="list-style-type: none"> the design change being outside of the scope/Order Limits of the Scheme, for example suggestions that the Scheme being implemented is wrong and that M60 Junctions 15 to 12 should be improved first; the design change being unaffordable or not value adding in terms of the BCR, for example item 8 of Table 5-15 which proposes installing additional interchange links at Simister Island; the change not being compliant or aligned with design standards for the strategic network; for example item 11 of Table 5-15 which proposes a bus lane to be implemented on the M60 which is a feature not compliant with the design of motorways; the design change having already been implemented and included in the Scheme design, for example item 4 of Table 5-15 which proposes using low noise road surfacing which is already included as part of the design; the design change being contrary to the Scheme objectives, for example item 38 of Table 5-15 which proposes creation of a separate motorway to split M62 traffic from M60 traffic.
8	BMBC to provide further evidence to support response to ExQ1 question DES1.1. to explain why it is satisfied with the design in general. BMBC and Applicant to provide further details on the advice provided by BMBC on the design during pre-application stage and how the design incorporated their comments.	Bury Metropolitan Borough Council (BMBC) and the Applicant	D4	<p>Bury Metropolitan Borough Council (BMBC) confirmed in their response to the first round of the Examining Authority's questions [REP3-031] ref DES.1.1 that BMBC has been in regular discussions with the Applicant from March 2021. This regular engagement is recorded in section 2 of the Statement of Common Ground (SoCG) with BMBC [REP2-006]. Following ISH2, the Applicant has discussed prior engagement relating to design with BMBC. In summary, the consideration of design has been limited to landscaping, local highway interfaces, diverted Public Rights of Way and drainage features. Prior to the application being made, the Applicant and BMBC considered if there were any relevant local design codes or principles relevant to the Scheme. None were identified and therefore nothing has been reported in the SoCG. The Applicant notes BMBC's confirmation of this point in their response to the first round of Examining Authority's questions [REP3-031] ref DES.1.2.</p> <p>The Applicant notes further that design matters of importance to BMBC, specifically detailed landscape and drainage proposals, will be subject to further consultation with BMBC, secured by Requirements 5 and 8 in schedule 2 of the draft Development Consent Order [REP3-006]. See also the Applicant's response to Action 53 below.</p>
9	Explain why, when the design review panel "strongly encouraged the design team to introduce more trees across the Scheme", this was not included within the proposed design and was not considered feasible, notwithstanding your comments in Table 4-2 row 8 in the Scheme Design Report [APP-151].	The Applicant	D4	<p>The Design Council's comment needs to be understood in context. The Design Council review occurred at an early stage of the development of the preliminary design of the Scheme. Landscaping design ordinarily occurs towards the end of the design programme, once elements such as earthworks and the overall understanding of the Scheme design "footprint" are known. This is to avoid abortive design work and re-work on elements of the design that might end up being removed from the Scheme design prior to the final environmental impact assessment and DCO application.</p> <p>The Applicant has reviewed the statutory consultation materials used (as shown in Annex L of the Consultation Report [APP-033]), and the presentation to the Design Council review meeting, which showed screenshots of the draft Environmental Masterplan provided in the Preliminary Environmental Impact Report (provided in Annex L of the Consultation Report [APP-033] and the Scheme visualisation used during the Design Council presentation and Statutory Consultation.</p> <p>At that time, the Scheme visualisation did not show or illustrate any landscape planting for the reasons cited above; Scheme visualisations require a 3D model of tree planting and this had not been developed. Therefore, the Design Council comment related to tree planting, was made at a point when there was an absence of landscape planting from the Scheme visualisations.</p> <p>In response to Statutory Consultation and after the point of engagement with the Design Council, several areas were subsequently removed from the Scheme. For example, the area north of the M60, west of Junction 17 where Pond 6 was located, the area west of pond 5, south of J18 and the area to the far north and east of the northern loop were removed. Details of these changes can be found in Table 5-14 of the Consultation Report [APP-021] and by comparing the Land Plans [REP3-004] with Map Book 2 – Land Use Plans used at Statutory Consultation which are provided in Annex L.9 of the Consultation Report [APP-033]. The overall reduction in area meant that tree planting opportunities were reduced in comparison to the point when the Design Council provided its observations.</p> <p>The Applicant considers that the volume of replacement tree planting is proportionate to the loss and is balanced against the environmental mitigation requirements of the Scheme. The quantum of trees shown within the landscape proposals also reflects the physical and geo-physical constraints of the Scheme area, specifically along the M60 corridor between J17 and J18 of the M60 which is particularly constrained. The presence of buried services such as statutory undertaker apparatus and drainage infrastructure also limit tree planting along their respective corridors due to the risk of root ingress and potential restrictions for future maintenance access.</p> <p>As outlined in Table 4-1 of the Scheme Design Report [APP-151], the landscape design and planting design fits into the context of the Scheme. Specifically, the Scheme landscaping has taken the Bury Unitary Development Plan (UDP) land use designations into account including Bury UDP Policy Env 9/1 Special Landscape Area and the Green Belt. For example, carefully designed groups of trees and shrubs to help integrate into the surrounding vegetation pattern. Particular attention has been given to avoid, reduce or remediate (offset) potential effects on the Special Landscape Area. Mitigation</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>and enhancement measures for this have been developed as presented on Figure 2.3, Environmental Masterplan of the Environmental Statement Figures [APP-057].</p> <p>It is also important that the Applicant is careful not to alter the balance of Biodiversity mitigation. As described in Paragraph 3.2.8 of Appendix 8.12 Biodiversity Net Gain Report [APP-102], whilst it is possible to increase the area of woodland within the planting proposal (and therefore to increase the number of trees planted), this would reduce the areas of other habitats. The current design is considered to optimise the diversity of habitats and therefore associated fauna. In Bury Metropolitan Borough Council's Response to ExQ1 BIO.1.8 [REP3-031], Bury support the proposed balance of grassland vs woodland habitat creation.</p> <p>In undertaking the LVIA, the assessment has considered the existing views of the M60 from surrounding areas, and where views exist the landscape proposals have provided screen planting, as well as for new views of the Scheme, to improve visual amenity particularly for residents, as shown on Figure 2.3 the Environmental Masterplan of the Environmental Statement Figures [APP-057]. As a result, Chapter 7 of the Environmental Statement [APP-046] (updated at Deadline 4) has recorded slight beneficial effects by year 15 in locations around the M60 J18 at representative viewpoint locations VP11, VP12, VP14, VP15, VP18, VP19, VP20, VP21 and VP30 shown on Figure 7.5 Representative Viewpoints and Photomontage Locations of the ES [APP-066] (updated at Deadline 4). This partly results from the screening improvement to visual amenity from proposed tree and woodland planting along the existing the M60 eastbound to M66 northbound link (VP11, VP12, VP14, VP15, VP19, VP30), M60 northbound to M60 westbound link (VP18, VP21) and Pond 5 (VP20). Photographs showing the visual baseline are shown on Figure 7.6 Representative Viewpoints 1-10 of the Environmental Statement [APP-064], Figure 7.6 Representative Viewpoints 11-20 of the Environmental Statement [APP-065] and Figure 7.6 Representative Viewpoints 21 – 29 of the Environmental Statement [APP-065] (updated at Deadline 4). Visual amenity would be improved for walkers on footpath 9WHI east of Pond 1 (VP7) and footpaths 28aPRE and 29aPRE west of Pond 5, as the new footpath alignments are near to new areas of wet woodland and other new tree planting as shown on Figure 2.3 the Environmental Masterplan of the Environmental Statement Figures [APP-057], which would improve visual amenity compared to the existing footpath routes.</p> <p>Along the mainline of the M60 between J17 and J18, where areas of planting are constrained by residential areas and the M60 itself, the interface generally comprises embankments where the Scheme has included broad leaved woodland and mixed woodland as shown on Figure 2.3 the Environmental Masterplan of the Environmental Statement Figures [APP-057]. Broad leaved woodland and mixed woodland is included in other areas within the Scheme. Appendix N: Outline Landscape and Ecology Management Plan of the First Iteration Environmental Management Plan [REP3-014] comprises of mostly trees within each planting mix. Table N.1 Indicative LE2.1.1a Native Mixed Woodland mix and Indicative LE2.1.1b Native Mixed Woodland - Broadleaf mix comprise the tree species alder, silver birch, pinus sylvestris, scots pine, wild cherry, English oak, rowan.</p> <p>The Design Council review panel also made the following observation, "<i>Opportunity to introduce wetlands as part of the scheme, for instance in the proposed new loop (although we appreciate that existing topography might make this difficult). Wetlands form part of the local geology and reintroducing them to the area would support biodiversity across the scheme. As an additional benefit, it might provide visual amenity to local communities and road users.</i>"</p> <p>Accordingly, Figure 2.3, Environmental Masterplan of the Environmental Statement Figures [APP-057] shows that such areas have been incorporated into the landscape design at low points of the Scheme. This will help retain surface water as well as improving the biodiversity of the area. Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057] also includes the area of wet woodland in an area east of Pond 1 and the associated drainage swale. Wet woodland has also been included in land west of Pond 5. Appendix N: Outline Landscape and Ecology Management Plan of the First Iteration Environmental Management Plan [REP3-014]. Table N.4 Indicative LE2.1.2 Native Wet Woodland mix comprises the tree species alder, silver birch, English oak, goat willow and crack willow. Tree species are the predominant species in the Wet Woodland mix. These areas have been included since the presentation of the Preliminary Environmental Design for the PEIR to the Design Council.</p>
10	Provide more details on the aspirations for the finished quality appearance of the Pike Fold Viaduct and Pike Fold Bridge.	The Applicant	D4	<p>The Applicant confirms, as set out in Chapter 2: The Scheme, of the Environmental Statement [APP-041] as well as the Scheme Design Report [APP-151], that both the Pike Fold Viaduct and the Pike Fold Bridge have been subject to a design process aimed at providing bridge structures that acknowledge the impacts of the Scheme on the wider landscape.</p> <p>The span arrangement of the viaduct has been a key consideration of the design and its ability to fit within the wider landscape. The structure is symmetrical in terms of the span arrangement (43m/56m/43m), which aids a more efficient design and helps facilitate improved buildability – that is to say it contributes to more efficient fabrication, construction and erection of the superstructure.</p> <p>In terms of materials, a combination of reinforced concrete and weathering steel is provided for the both the bridge and viaduct spans with reinforced concrete piers and abutments combined with mechanically stabilised earth wingwalls.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>In terms of aesthetics, over time, as a dark bronze and deep purple patina forms on the weathering steel, the structures will become recognisable gateway features for users of the M66 and on the northern loop. The combination of weathering steel and landscape planting along the structure embankments will also be visually attractive and will help to physically integrate the structures into the landscape and help provide a strong design statement. At Pike Fold Viaduct, the two intermediate piers, full-height abutments and flared wingwalls will incorporate precast concrete modular shell units tying into the approach embankments, minimising construction time and providing a durable, clean and contemporary appearance. The single-span Pike Fold Bridge, which carries the M66 southbound off-slip over the northern loop, includes a superstructure using a similar combination of reinforced concrete and weathering steel girders to the viaduct. It's full height abutments will incorporate precast concrete facing panels flared away from the carriageway with wrap-around earthworks.</p> <p>At Deadline 1 of the Examination, the Applicant provided supplementary photomontages in the form of specific structure visualisations [PD1-007] and these illustrate how the structures will appear to motorists in the design year, 2044, 15 years post opening of the Scheme.</p> <p>The Applicant is considering the need for further commitments to be given in respect of the design of the two new structures and this will be addressed as necessary in an updated draft Development Consent Order to be submitted at Deadline 5 of the Examination</p>
11	Explain whether a document setting out the design principles can be produced to define the design principles that are to be incorporated into the detailed design, bringing together the different design objectives and mitigation measures set out across the application documents of the Scheme.	The Applicant	D4	<p>Upon review and following the discussion on this topic during Issue Specific Hearing 2 on 27 November 2024, the Applicant considers that a document that further outlines the alignment between the design principles as outlined in "The Road to good design", the elements of the Scheme design and the design measures which form fundamental mitigation of environmental impacts, could be produced for Deadline 6 of the Examination. The Applicant is considering how this might then be secured and will be addressed as appropriate in an update to the draft Development Consent Order [REP3-006] to be provided at Deadline 5 of the Examination.</p>
12	Supply a written submission of the further detail supplied in the hearing which explained how Table 12.28 in Environmental Statement (ES) Chapter 12 was created and why the ratings within it are considered appropriate.	The Applicant	D4	<p>National Highways' standard for assessing and reporting the environmental effects on population and human health from the construction, operation and maintenance of highways schemes is set by the Design Manual for Roads and Bridges (DMRB) LA 112 Population and Human Health (Revision 1). The human health assessment for the Scheme has therefore followed this standard. However, DMRB LA 112 only requires health outcomes to be reported as 'positive', 'neutral', 'negative' or 'uncertain', and does not provide significance criteria for the assessment of health effects. ID 4.8.7 of the Planning Inspectorate's Scoping Opinion [APP-144] stated that:</p> <p><i>'Regulation 14(2)(b) of The Environmental Impact Assessment (EIA) Regulations 2017 states that the environmental statement must include a description of the likely significant effects of the Proposed Development. Section 5(d) of Schedule 4 of the EIA Regulations states that information for inclusion in environmental statements includes a description of the likely significant effects of the Proposed Development on the risks to human health.</i></p> <p><i>Therefore, the ES should describe the methodology for determining the significance of effects and report the significance of effects on human health.'</i></p> <p>The aim, when developing Table 12.28, within Chapter 12 Population and Human Health of the Environmental Statement [APP-051] was therefore to meet the reporting standard of DMRB LA 112, whilst including for significance criteria to meet the above interpretation of the EIA Regulations. The Applicant drew on the following standard and guidance to support the development of significance criteria for the human health assessment:</p> <ul style="list-style-type: none"> • DMRB LA 104 - Environmental assessment and monitoring. This sets out requirements for reporting value, magnitude and significance of environmental effects for highway projects. • Institute of Environmental Assessment and Management (IEMA) Guide to Determining Significance for Human Health in Environmental Impact Assessment (Pyper et al., 2022) (hereafter referred to as the 'IEMA Guide'). The IEMA Guide was introduced after the scoping assessment for the Scheme was undertaken. <p>Paragraph 3.31 of the DMRB LA 112 standard requires the sensitivity of a community/population to be reported as:</p> <ol style="list-style-type: none"> 1) Low; 2) Medium; or 3) High.

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>DMRB LA 112 therefore differs from the five categories of sensitivity (which are Negligible, Low, Medium, High, and Very High) applied in the generic significance matrix set out in Table 3.8.1 of DMRB LA 104 - Environmental assessment and monitoring. The intention to report sensitivity as Low, Medium or High in line with LA 112 was set out in paragraph 13.7.12 of the Scoping Report [APP-143]. In developing Table 12.28 within Chapter 12 Population and Human Health of the Environmental Statement [APP-051], the Applicant adapted Table 3.8.1 of DMRB LA 104 so that it aligned with the three categories of sensitivity reporting required by DMRB LA 112. Definitions for each sensitivity level have been provided in Table 12.25 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. This was adapted from the criteria in Table 7.1 of the IEMA Guide to allow for the three levels of sensitivity. The Applicant considers that this was appropriate to do on the basis that paragraph 7.1 of the IEMA Guide states that the tables in its guidance 'are indicative of generic four-category EIA matrices, other matrices are also commonly used. The approach may be adapted depending on the generic EIA sensitivity and magnitude matrix used by the project.'</p> <p>Since DMRB LA 112 does not provide magnitude criteria for human health, the Applicant referred to the IEMA Guide. The IEMA Guide provides four categories of magnitude ('High', 'Medium', 'Low' and 'Negligible') as set out in Table 7.2. The Applicant therefore opted to apply four categories of magnitude for the health assessment reported in Chapter 12: Population and Human Health of the Environmental Statement [APP-051], but amended the terminology to 'Major', 'Moderate', 'Minor' and 'Negligible' to be consistent with the magnitude of impact terminology used in Table 3.4N of the DMRB LA 104 standard and the land use and accessibility part of the assessment in Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. The application of the DMRB terminology to the IEMA Guide magnitude criteria is stated in paragraph 12.12.28 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. Table 3.7 of DMRB LA 104 provides descriptions for significance based on five significance categories: 'Very large', 'Large', 'Moderate', 'Slight' and 'Neutral'. In contrast, the IEMA Guide provides descriptors for four levels of significance: 'Major (significant)', 'Moderate (significant)', 'Minor (not significant)', and 'Negligible (not significant)'. The Applicant adapted the IEMA Guide descriptions for these four categories of significance as set out in Table 12.27 of Chapter 12: Population and Human Health of the Environmental Statement [APP-051]. As for magnitude, it was the Applicant's preference to apply the same significance terminology as DMRB LA 104 for consistency with the standard and the land use and accessibility part of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. The Applicant therefore used the terms 'Large', 'Moderate', 'Slight' and 'Neutral', while dropping the fifth category of 'Very large' to make for an easier alignment with the IEMA Guide and three categories of sensitivity. The generic significance matrices set out in Table 3.8.1 of DMRB LA 104 and Table 7.3 in the IEMA Guide both have cells where there are more than one category of significance to choose from, in some cases being the difference between a significant effect category ('moderate') or a not significant category ('Slight' or 'Minor'). Paragraph 3.8.1 of DMRB LA 104 states that where the table includes two significance categories 'evidence should be provided to support the reporting of a single significance category'. Paragraph 7.3 of the IEMA Guide states that 'It will often be the case that relevant criteria span categories of level, e.g., a high scale of change, but over a short-term duration. In these instances, the narrative should reflect elements of multiple categories and a judgement made on the most appropriate level, taking into account all relevant criteria.' The IEMA Guide requires a supporting narrative when assigning significance and Annex 2 of the IEMA Guide provides worked examples as to how a judgement of significance may be arrived at using the guidelines. DMRB LA 104 also notes that the approach to assigning significance 'relies on reasoned argument' (Note 2, DMRB LA 104, page 14). In line with this, the Applicant provided a narrative to support each assessment of significance of human health effect reported in Section 12.18 of Chapter 12 Population and Human Health of the Environmental Statement [APP-051]. The narrative aims to provide a reasoned judgement as to why each significance of health effect has been applied.</p>
13	Provide further details on the measures proposed to ensure the number of private vehicles using Mode Hill Lane to access the main site compound are minimised as far as possible and explain how this would be secured in the draft Development Consent Order (dDCO).	The Applicant	D4	<p>The Applicant is installing a temporary construction access and egress off the M60/M66 motorway network into the main site compound. This will allow what are commonly referred to as 'Chapter 8' vehicles to access and exit the main site compound without the need to use Mode Hill Lane. Chapter 8 refers to that part of the Traffic Signs Manual issued by the Department for Transport (DfT) and the traffic management livery on vans and road maintenance vehicles. Mode Hill Lane will therefore be restricted to private use by non-Chapter 8 vehicles only. It is expected that site vans used by the workforce for personal use will be Chapter 8 compliant to enable use of the motorway accesses, which will further reduce the use of Mode Hill Lane for private commuting.</p> <p>The Applicant will encourage the adoption of car sharing by the workforce travelling to the site to minimise the number of private vehicles in use. The main site compound has been suitably positioned to allow for, and encourage, the use of public transport and active travel. The main site compound is 350 metres from a bus stop served by two bus lines, the 94 and 97, which provide direct links to Bury Town Centre, Manchester City Centre, and the residential areas of Hollins, Lower Broughton, Salford, Shudehill, Pilsworth, Prestwich, Bowker Vale and Higher Crumpsall. The main site compound is also located within a mile of Besses o' th' Barn Metrolink station, which provides direct links to Bury Town Centre, Manchester City Centre, Trafford, Stretford, Sale and Altrincham. The main site compound will be safely accessible from Mode Hill Lane for both pedestrians and cyclists, encouraging the use of active travel for site staff living within the locality. It is expected that the number of staff accessing site would be further reduced because of some office roles being suitable for remote working, with staff being able to work from home or in other offices for a portion of their time.</p> <p>Measures to ensure use of Mode Hill Lane is restricted during the construction phase are secured by Requirement 10 of the draft Development Consent Order [REP3-006]. The traffic management plan will be developed by the Applicant and submitted for approval by the Secretary of State prior to the start of construction and following consultation with Bury Metropolitan Borough Council.</p>
14	Confirm whether the noise assessment accounted for the condition of Mode Hill Lane. Also explain how, if any	The Applicant	D4	<p>The Applicant confirms that the condition of the road surface is not taken into consideration in the Calculation of Road Traffic Noise (CRTN) methodology that is used to predict road traffic noise. The use of CRTN is the prescribed approach to predicting road traffic noise within the NPS NN 2015 (paragraph</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
	preconstruction work was required on sections of Mode Hill Lane outside the Order Limits, this could be secured as part of the dDCO.			<p>5.191). Therefore, the condition of Mode Hill Lane has not been taken into consideration in the assessment of potential changes in construction road traffic noise.</p> <p>The potential noise impact from construction traffic on the local road network is summarised in Paragraph 11.8.25 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. The amount of construction traffic was compared to existing traffic, and any increases in road noise was found to be less than 1dB on all roads. This is a negligible magnitude of impact, and not considered to be significant.</p> <p>During construction, construction traffic using Mode Hill Lane will be limited to cars and light vehicles. Heavy Duty Vehicles will not use Mode Hill Lane for access. See the Applicant's response to action 13 above.</p> <p>The Applicant further confirms that no pre-construction work to Mode Hill Lane outside the Order Limits is anticipated. The Applicant notes Bury Metropolitan Borough Council's response to the Examining Authority's first round of written questions [REP3-031] ref TT.1.3 relating to Mode Hill Lane, confirming that the adopted highway is in a condition for all traffic that may be reasonably be expected to use it.</p>
15	Explain why a medium value was assigned to footpath 9WHI as opposed to high and whether any change to the value would change the assessment findings.	The Applicant	D4	<p>The Applicant confirms that the criteria for assigning value to Public Rights of Way (PRoW), as provided by the Design Manual for Roads and Bridges (DMRB) LA 112 Population and Human Health, is set out in Table 12.8 of Chapter 12: Population and Human Health, of the Environmental Statement [APP-051]. Unlike the definition for 'high', the definition for 'medium' does not make reference to frequency of use and the criteria is open to interpretation. The Applicant interpreted the definition for 'medium' as being those PRoW which are regularly used locally for recreation, but which are not likely to attract many people from outside the local area, as might be expected for regionally promoted routes. The Applicant considers that footpath 9WHI falls into this interpretation, as included in the reasoning set out against it in Table 12.15 of Chapter 12: Population and Human Health, of the Environmental Statement [APP-051], which acknowledges that the route is likely to be used regularly for recreation.</p> <p>During ISH2 held on 27 and 28 November 2024, the Examining Authority questioned whether the high frequency of use of footpath 9WHI meant it should be interpreted as high value. The Applicant has considered this point and reviewed the implications for the assessment conclusions if this change were to be made.</p> <p>During the construction stage, the magnitude of impact on footpath 9WHI was assessed as 'major'. The matrix from Table 3.8.1 of DMRB LA 104 offers the assessor the choice between a 'moderate' or 'large' significance of effect where a 'major' magnitude impact involves a 'medium' value receptor. The Applicant made the judgment that 'moderate adverse' was the appropriate level of significance to assign in this instance. This reflects the fact that the impact would be temporary and medium term (as per definitions in paragraphs 12.4.16 and 12.4.17 of Chapter 12: Population and Human Health, of the Environmental Statement [APP-051]. According to DMRB LA 104, effects at a moderate level of significance 'can be considered to be material decision-making factors'. If footpath 9WHI was valued as 'high' Table 3.8.1 of DMRB LA 104 offers the assessor the choice between 'large' or 'very large' for the significance of effect. Effects at a very large level of significance 'are material in the decision-making process', while effects of a large 'level of significance 'are likely to be material in the decision-making process'. Regardless of whether footpath 9WHI is valued as 'medium' or 'high', therefore, the residual construction effect is judged as significant for the purposes of the environmental impact assessment.</p> <p>During operation, the Applicant assessed the magnitude of impact on footpath 9WHI as 'negligible beneficial'. This is based on the DMRB LA 112 magnitude criteria which relates to change of distance for journeys via a route with any decrease being considered 'beneficial' and any increase being considered 'adverse'. The matrix in Table 3.8.1 of DMRB LA 104 offers the assessor a choice between 'neutral' or 'slight' significance. The Applicant does not consider that the marginal decrease in route length in the context of this recreational footpath was of residual benefit and therefore judged the effect to be of neutral significance. If footpath 9WHI is valued as 'high', the significance of effect through following the matrix in Table 3.8.1 of DMRB LA 104 would be 'slight' (beneficial). Effects of 'slight' significance are described in DMRB LA 104 as 'not material in the decision-making process'.</p> <p>In conclusion, the assignment of 'high' value to footpath 9WHI would not alter the assessment conclusion that the effect on this route is judged significant during construction, and not significant during operation.</p>
16	Review what is included within the proposed Scheme in respect of safety measures for footpath 9WHI and whether any planting/screening from the motorway for mitigation is included, or could be included, which could be considered an enhancement	The Applicant	D4	<p>The Applicant confirms that, as shown on the General Arrangement Plans [APP-005] between chainage 2210 (where the diverted Public Right of Way (PRoW) (9WHI)) connects to the existing alignment and chainage 2020, the PRoW is at the top of a cut slope (i.e. above the new M66 southbound diverge), following this, the new M66 southbound diverge transitions to embankment. As such, during the detailed design, a detailed assessment of risk will be undertaken that considers the proximity of the PRoW to the M66 Southbound diverge link and the height of embankment to determine whether a safety barrier will need to be installed and, if so, over what longitudinal distance.</p> <p>Where a safety barrier is required on the approach to the Pike Fold Bridge, it will connect to the parapet of the new Pike Fold Bridge and this combination of safety barrier and bridge parapet will ensure that vehicles cannot deflect down and onto the PRoW. A Stage 2 Road Safety Audit will be undertaken at the detailed design.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				Figure 2.3: Environmental Masterplan, of the Environmental Statement Figures [APP-057] shows the proposed mitigation planting, secured through Requirement 5 of the draft DCO [REP3-006]. In this area mitigation planting, consisting of native woodland, native shrub and intermittent tree belts, is proposed on the embankments of the Northern Loop and M66 southbound diverge link to both integrate the earthworks and provide screening of traffic in wider views from the east, including the PRoW. Hedgerow planting, along the diverted section of footpath 9WHI is provided adjacent to balancing pond 1 to link the field patterns and also provide immediate screening for closer range views once established. The majority of planting areas are of a suitable size (over 5m width) that once established should provide adequate screening of views from a user of footpath 9WHI to the M66 and most of the northern loop traffic. North of where the diverted section of footpath 9WHI connects to the existing alignment, views will be as they are presently.
17	Consider whether any measures could be undertaken as part of the Scheme to improve the Haweswater Underpass Permissive Path. Detail how any measures identified could be secured as part of the dDCO.	The Applicant	D4	<p>The Applicant has considered whether any measures could be undertaken to improve Haweswater Underpass as part of the Scheme and has added commitment G9 to the Register of Environmental Actions and Commitments in the First Iteration Environmental Management Plan [REP3-014] which provides that:</p> <p><i>“Prior to reinstatement of Plots 1/1k and 2/1a, the Principal Contractor will consult with the relevant planning authority, Bury MBC and United Utilities to discuss and endeavour to agree retention of temporary surface treatment to improve access along the permissive path through Haweswater underpass.”</i></p> <p>In order to undertake works to Plots 1/1k and 2/1a as shown on sheets 1 and 2 of the Land Plans [REP3-004], which involves moving plant/vehicles perpendicular to the underpass across the Haweswater Aqueduct, it will be necessary for the Applicant to install protection measures by the underpass. Those protection measures will be agreed with United Utilities, but will likely comprise of a stoned up area along with protection slabs over the aqueduct. These measures are shown indicatively on sheet 2 of Figure 2.4 of the Environmental Statement Figures [APP-057]. Also, where the underpass structure is to be widened at carriageway level, there may be a need for scaffolding to be erected across the entrance to the underpass and over the water main itself. This will likely need to be erected on a stoned up platform, with possible use of protection matting over the water main. The working area will also be cleared of vegetation in the early stages of construction. At the end of the construction phase, it was proposed to reinstate the land back to its original condition. However, having given this further consideration, the Applicant considers that there could be benefits to leaving any temporary surface in-situ at the end of the construction phase. This would require consultation and agreement with Bury Metropolitan Borough Council and United Utilities to ensure that it would not have a detrimental impact on Haweswater Aqueduct and also that future maintenance access requirements are not impeded. If this can be achieved, then it will result in some improvements which benefit users of the underpass.</p>
18	Currently the junction is stated as having a capacity of 90,000 vehicles. Provide the equivalent future capacity of the junction if this Scheme was constructed	The Applicant	D4	<p>The Applicant confirms that the 90,000 vehicles relates to the number of vehicles that use the junction every day, rather than the absolute capacity of the junction. The actual daily capacity of the junction itself is dependent on the profile of traffic throughout the day and the relative proportion of movements making each turn at the junction, so it is not possible to definitively state the capacity of the junction with and without the Scheme. However, as an indication of the additional capacity provided by the Scheme, the plots of traffic flows with and without the Scheme. Chapter 4 and Appendices B & C of the Transport Assessment [APP-149] provide a measure of the additional traffic throughput accommodated by the Scheme.</p>
19	Supply a written submission of the further detail supplied in the hearing which explained how much traffic would be induced by the proposed Scheme, which parts of the network this traffic would affect and how this additional traffic has been incorporated into the modelling. Also explain how induced traffic was accounted for in the BCR.	The Applicant	D4	<p>The Applicant confirms that the Transport Assessment [APP-149] sets out the process followed to develop and apply traffic modelling to assess the Scheme. This follows the DfT's Transport Analysis Guidance (TAG). This process firstly involved developing traffic models in line with observed traffic data to reflect the traffic conditions as they were in the Scheme (2018) baseline.</p> <p>There are two key components to the modelling system: a traffic assignment model in SATURN and a Variable Demand Model (VDM) in DIADEM software.</p> <p>The traffic assignment model covers the road network in the Greater Manchester area in detail and determines the routes vehicles take through the road network and the subsequent travel times and flows on each bit of the road network.</p> <p>The Variable Demand Model predicts and quantifies changes in travel demand in response to changes in travel time and cost from the baseline. This includes the following responses to changing traffic conditions:</p> <ul style="list-style-type: none"> ○ People changing where they travel (trip distribution) ○ People changing when in the day they travel (time period choice) ○ People choosing to travel more or less often (trip frequency) ○ People changing the mode of transport they use to travel (mode choice) <p>The VDM and the Assignment Model iterate back and forth with demand information being passed to the Assignment Model and travel time and cost information being passed to the VDM. The Applicant then forecast future scenarios accounting for more likely local developments and future year traffic growth from DfT's National Trip End Model Forecasts and the government's projection of future goods vehicle traffic, the National Road Traffic Projections (2022).</p> <p>Future forecast scenario models are developed with and without the Scheme in place and the difference between these two sets of models is then the impact of the Scheme. All forecast scenarios are run through both components of the modelling system and therefore the traffic modelling accounts for the following potential responses to the Scheme:</p> <ul style="list-style-type: none"> ○ Re-routing of traffic via the traffic assignment model ○ The above 4x travel demand changes via the variable demand model

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>For the elements of the BCR that are reliant on outputs from the traffic model (traffic flows, journey times etc.) these outputs are generated after both elements of the traffic models have been run and therefore account for the induced traffic quantified by the model.</p> <p>The Transport Assessment [APP-149] sets out the forecast changes in traffic volumes in the Scheme area that result from implementation of the Scheme. It is not possible to separate these changes out into volumes of traffic that have re-routed from elsewhere vs the various demand responses as these things are all interlinked in the model run process.</p>
21	<p>Explain why it is appropriate to use a figure of 75% for activity time in noise calculations for this Scheme when 83% was applied in the</p> <p>A12 Chelmsford to A120 Widening Scheme.</p>	Applicant	D4	<p>The Applicant considers the figure of 75% to be an appropriate estimation of overall activity time for works associated with the Scheme. There will be expected to be some variation in activity times between shifts and between construction phases and the 75% has been used as an average. There is proportionally more night-time working programmed for the Scheme than was programmed for the A12 Chelmsford to A120 Widening Scheme, and the amount of work that can be completed in a night shift is usually less than a similar day shift. In addition, for safety reasons, online night works cannot be started until motorway traffic counts drop to below a specified traffic flow, so this can also reduce the time when works can be undertaken at night.</p> <p>The calculation method for construction noise is given in Annex F (part F.2.6.2) of BS5228-1:2009+A1:2014 Code of practice for noise and vibration control on open sites Part 1 - Noise. In decibel terms the difference in the use of a 75% activity time and the use of 83% activity time is 0.4 decibels (dB). If no activity time correction were to be applied, and 100% assumed, then the difference from the use of 75% would be 1.2dB. For clarification, a 100% activity time has been applied for the use of generators in the calculations carried out for the Scheme.</p> <p>The predicted construction noise levels at receptors for the Scheme have been reviewed, and the margin of 0.4 dB added to each receptor to establish the change between the use of an overall 75% to an overall 83% activity time. There would be an increase of 15 receptors from 275 to 290 with a temporary significant adverse effect during the day-time, and an increase of 29 receptors from 647 to 676 with a temporary significant adverse effect during night-time construction works.</p> <p>This change in the numbers of receptors significantly affected with the use of an 83% activity time instead of 75% activity time does not materially alter the findings of the assessment. Significant temporary adverse effects have been identified for multiple receptors during the construction phase. The mitigation measures proposed in Chapter 11: Noise and Vibration of the Environmental Statement [APP-050] and included in the Register of Environmental Actions and Commitments, contained within the First Iteration Environmental Management Plan [REP3-014], remain appropriate and applicable.</p>
22	<p>Consider if further noise barriers should be included within the Proposed Scheme to provide long term noise reduction in the Noise Important Areas. Supply detail of how any additional barriers would be secured in the dDCO or explain why additional barriers are not proposed.</p>	Applicant	D4	<p>The Applicant has considered whether further noise barriers should be included within the Scheme but has concluded that they are not necessary.</p> <p>The assessment of road traffic noise is presented in Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. In order to mitigate against predicted adverse impacts from road traffic noise, a low noise road surface with better noise reducing properties than a conventional low noise surface (with a -6.0 decibel (dB) Road Surface Influence (RSI)) has been proposed as essential noise mitigation. This is secured as commitment NV4 in the Register of Environmental Actions and Commitments within the First Iteration Environmental Management Plan [REP3-014]. Taking a precautionary approach to the assessment, an assumption has been made that the performance of this surface could reduce over time. The modelling of road traffic noise has therefore used an RSI of -6.0 dB for the opening year of the Scheme, reducing to -3.5 dB in the future year (2044, 15 years after opening).</p> <p>The results of the long-term assessment are shown in Figure 11.9a Road Traffic Noise – Magnitude of Change in the 2044 Future Year (Daytime) of the Environmental Statement Figures [APP-071] and presented in Table 11.35 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]. Negligible magnitude decreases and increases in road traffic noise for 4,638 and 1,753 receptors respectively are predicted over the long term with the Scheme. In comparison the predicted non-project long term change (as summarised in Table 11.36 of Chapter 11 Noise and Vibration of the Environmental Statement [APP-050]) indicates negligible decreases and increases in road traffic noise for 528 and 2,326 dwellings respectively. There are a higher number of dwellings that are predicted to experience decreases in road traffic noise with the Scheme than without the Scheme (the difference is 4,110 dwellings), albeit of a negligible magnitude. Figure 11.9a Road Traffic Noise – Magnitude of Change in the 2044 Future Year (Daytime) of the Environmental Statement Figures [APP-071] indicates that most of these decreases occur within NIA 1671, where the low noise surface with better noise reducing properties than a conventional low noise surface is being installed.</p> <p>The Applicant is proposing essential mitigation that will provide both short-term and long-term reductions in road traffic noise within NIA 1671 alongside the M60 between J17 and J18. The reductions in road traffic noise are above the threshold for significant effects in the short term, and below the long-term threshold for significant effects (based on the assumption that the performance of the surface could reduce over time to -3.5 dB in the future year). Therefore, the Applicant is not proposing to also install additional noise barriers alongside the M60.</p>
23	<p>Include detail of how the proposed dust mitigation measures for this Scheme would be successful in mitigating impacts from construction dust relating to stockpiles (and other dust issues related to site compounds). Include</p>	Applicant	D5	

Action	Description	Action by	When	Applicant Response & Summary of Action taken
	details of any examples where these measures have been used successfully on other projects.			
25	Respond to the four points of context raised by BMBC which detailed why they are requesting future monitoring of air quality.	Applicant	D4	<p>Four points of context were raised by Bury Metropolitan Borough Council at ISH2 with regard to monitoring which (para-phrased) are:</p> <ol style="list-style-type: none"> 1. National Highways' legal requirement to meet Limit Values. 2. National Highways relying on improvements in air quality for lack of exceedances. 3. Data used by multiple parties, for example National Highways used Bury Metropolitan Borough Council's data for Scheme etc. 4. To address concerns of residents in terms of what the impacts of the Scheme will be and that monitoring is needed to understand the impact on human receptors. <p>Chapter 5 Air Quality of the Environmental Statement [APP-044], and Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079] provide details of the methodology used to assess air quality impacts as a result of the Scheme. The methodology followed is in accordance with National Highways' Design Manual for Roads and Bridges LA 105 Air Quality standard. Broadly speaking, traffic modelling of the Scheme in the opening year (2029) is used to model air pollution both with and without the Scheme. As monitoring cannot be undertaken for future years, or used to assess the impact of the Scheme, modelling is used. A past year is also modelled (in this case 2018) using the same methodology and the results compared to monitored air pollution data for the same year (2018) to confirm that the methodology provides robust predictions. Scheme specific monitoring was undertaken to fill in gaps spatially to ensure that the model would provide robust predictions. Details of monitoring of nitrogen dioxide are provided in Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079].</p> <p>Two sets of factors were applied to the modelling:</p> <ol style="list-style-type: none"> a. Verification factors were applied to the base year and future years to account for systemic over or under-prediction. The verification factors were derived by comparing the modelled results with monitored data as discussed in paragraphs 1.3.1-1.3.7 and 1.3.20-1.3.26 in Appendix 5.1 Air Quality Methodology of the Environmental Statement Appendices [APP-079]. In Zone 1 (between junctions 17 and 18 of the M60, refer to Figure 5.3 Air Quality Baseline Conditions of the Environmental Statement Figures [APP-058]) the verification factor of 0.69 was calculated, however, a factor of 1 was applied, as a worst-case assumption. The use of 1 as a verification factor in Zone 1, between M60 junctions 17 and 18, will have resulted in overpredictions between M60 junctions 17 and 18, however, this was done due to concerns raised by Bury Metropolitan Borough Council about using a factor lower than 1 (refer to Table 5.8 in Chapter 5 Air Quality of the Environmental Statement [APP-044]). This means that all results close to the M60 between junction 17 and 18 will be over-predicted. b. Long terms trends factors were applied to future years non-limit value compliance modelling only, as explained in paragraph 5.4.20 of Chapter 5 Air Quality of the Environmental Statement [APP-044], which gives a worst-case overprediction for human health receptors for future years and is not used by the Department for Environment, Food and Rural Affairs (Defra) or local authorities in their modelling. Note that long terms trends are part of the Design Manual for Roads and Bridges LA 105 Air Quality standard for human health receptors, but not for Limit Value compliance, as paragraph 2.55 explains "<i>The compliance risk assessment shall use the results from the Defra methodology so the assessment is consistent with Defra's reporting on compliance with the EU limit values.</i>". Limit Value compliance modelling is more aligned to the Defra Local Air Quality Management Technical Guidance (TG22) guidance (available at https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf), which is also used by local authorities for their air quality modelling, which does not include long term trends adjustment. <p>In the context of the Scheme, the Scheme itself does not lead to any new exceedances or worsening of the existing exceedances, as discuss in section 10 of Chapter 5 Air Quality of the Environmental Statement [APP-044]. Therefore, from a Scheme perspective, there is no requirement for monitoring.</p> <p>However, from a wider perspective, there are predicted exceedances in the Do-Minimum (without Scheme) in both the construction and opening years for human health receptors, which all occur along the M60 between junctions 17 and 18 (i.e. where it is known there will be an over-prediction). The limit value compliance modelling (which does not include the long term trends adjustment factors to keep it in line with Defra and local authority modelling) does not result in any exceedances (even though it still includes the over-prediction between M60 junctions 17 and 18). The limit value modelling is discussed in paragraphs 5.10.18-5.10.20 and 5.10.32-5.10.34 of Chapter 5 Air Quality of the Environmental Statement [APP-044] (with the results in Tables 1.7 and 1.8 in Appendix 5.2 Air Quality Results of the Environmental Statement Appendices [APP-080]). The highest concentration in the construction modelling was 39.1 µg/m³ and in the operational modelling 37.2 µg/m³ for the NO₂ annual average for the limit value compliance modelling, which occur between M60 junctions 17 and 18 (and so will be an over prediction). The reason for these differences between the limit value compliance modelling and the human</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>health modelling is the use of the long term trends uplift factors which are not used by local authorities or Defra in their modelling and therefore for compliance purposes have not been used in any limit value compliance modelling.</p> <p>Examination of the monitored data referred in Bury Metropolitan Bury Council's response to AQ.1.2 (Appendix 3 2023 Air Quality Annual Status Report [REP3-034], which is available at https://cleanairgm.com/data-hub/monitoring-reports) for Greater Manchester shows a definite downward trend (which is expected and in line with trends elsewhere in the UK). Many locations, including those adjacent to the Scheme, are now not in exceedance. The sites closest to the Scheme and M60 are Bury 20 (BU20, Bury 19 (BU19) and Bury 4 (BU04), which have not exceeded since 2019. The locations of these sites are shown on Figure 5.3 Air Quality Baseline Conditions of the Environmental Statement Figures [APP-058], though the location of site BU20 is not shown (as it was not used in verification), but BU20 is next to DT15 which is shown. As the downward trend in concentrations is expected to continue due to newer more efficient vehicles, it would be expected that by the opening year, without the Scheme, concentrations would be much lower than they are now (e.g. the concentrations of Bury sites close to the Scheme in 2023 and not on the A56 were all below 35µg/m³).</p> <p>Monitoring can be used to assess concentrations at a certain point in space and time (i.e. the location that is monitored and the time period over which the monitoring occurs). Monitoring cannot be used directly to assess future concentrations or the impact of one variable (such as the Scheme). Monitoring data from one year to another for the same location can vary due to the following reasons: wind speed, wind direction, pollution sources (e.g. road traffic vehicles) and other variables. For these reasons, Defra require multiple years of monitoring data as proof from local authorities before they can revoke an AQMA (to account for changes in concentrations due to things like varying meteorological conditions as opposed to just changes in road traffic emissions). It is also for these reasons, and that emissions and associated concentrations are also reducing over time (due to newer less polluting vehicles), that air quality monitoring is not normally part of a post Scheme evaluation, unless there are potential exceedances due to the Scheme.</p> <p>Taking the above into account and in response to each of the four points in turn:</p> <ol style="list-style-type: none"> National Highways Legal requirement to meet Limit Values. National Highways does have a legal requirement to meet limit values where they apply on the Strategic Road Network. Limit value compliance modelling and recent monitoring do not show any risk of limit value exceedance on the Strategic Road Network on or around the Scheme and so no monitoring is required. National Highways relying on improvements in air quality for lack of exceedances. At present, existing monitoring, as well as modelling, would indicate no limit value compliance issues when the Scheme is in place, so this is not true. However, the Scheme has been designed to reduce congestion. The reduction in congestion will result in more free flow traffic, which in turn will result in lower emissions per vehicle (vehicles are more efficient and produce less emissions in freeflow). Data used by multiple parties, for example National Highways used Bury Metropolitan Borough Council's data for the Scheme etc. National Highways are under no obligation to undertake air quality monitoring unless there is a potential exceedance and, given the points above, it is not likely that there will be an exceedance due to the Scheme. To address concerns of residents in terms of what the impacts of the Scheme will be and that monitoring is needed to understand the impact on human receptors. Monitoring will not provide an answer to the impact of the Scheme. It would only provide a snapshot of what the air pollution levels were at that point in time and space, which would be due to a number of variables, the impact of the Scheme being just one. Only modelling can provide an answer of what the difference would be with and without the Scheme in place.
27	Provide written submissions on the comments raised by BMBC in respect of the Boswell judgements.	Applicant and BMBC	D4	<p>The Applicant and BMBC have agreed the following note which summarises the factual position of the Boswell judgements.</p> <p>The Boswell judgements comprise:</p> <ol style="list-style-type: none"> High Court – R (on the application of Andrew Boswell v The Secretary of State for Transport and National Highways [2023] EWHC 1710, which dismissed Dr Boswell's challenge; Court of Appeal – R (on the application of Andrew Boswell v The Secretary of State for Transport and national Highways 2024 EXCA Civ 145, which upheld the decision of Thornton J in the High Court; and Supreme Court – R (on the application of Boswell v The Secretary of State for Transport and another UKSC 2024/0046, which refused permission for Dr Boswell to appeal the decision of the Court of Appeal. <p>This note identifies the key elements of the Court of Appeal (CoA) judgement which summarised and endorsed the decision of Thornton J in the High Court. The Supreme Court decision served only to confirm that Boswell did not have an arguable point of law and permission to appeal further to the Supreme Court was refused.</p> <p>Paragraph 26 of the CoA judgement records the reasoning offered by the Secretary of State (SoS) for endorsing the use of national targets to assess the environmental impacts of carbon emissions. Specifically, the SoS noted that the impact and effect of carbon emissions on climate change, unlike other EIA</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>topics, is not limited to a specific geographical boundary and that the only statutory budgets are those at a national level. As a result, the SoS was satisfied that an assessment against national budgets was consistent with the National Policy Statement for National Networks (NPSNN) 2015 being the same NPSNN against which the M60 Scheme is being assessed.</p> <p>Paragraph 27 of the CoA judgement cites the Institute of Environmental management and Assessment 2022 guidance for assessing green house gas (GHG) emissions and their significance (IEMA Guidance), in support of the SoS' position, confirming that "there is no defined boundary for assessing the impact of carbon emissions" and GHG emissions are global, not local in their impact.</p> <p>Paragraph 38 of the CoA judgment endorses and quotes from the High Court judgement, affirming that the UK Carbon Budgets are science based targets for the reduction of GHG emissions based on global carbon budgets, are required to achieve the goals of the Paris Agreement (enshrined in UK law in the Climate Change Act 2008) and that the Government has not set national targets on a sector-by-sector basis, such that there is no sectoral target for transport.</p> <p>Paragraph 43 of the CoA judgement directly quotes paragraph 83 of the High Court judgement:</p> <p>"The IEMA guidance may be said to suggest that Dr Boswell's approach is arbitrary, from a scientific perspective at least. This is because it seeks to assess the significance of carbon emissions, which have no geographical limit to their impact, against a national target which has no sectoral limit, by reference to a collection of local, sector based, development (characterised on behalf of Dr Boswell as 'proximal' development). There is no scientific rationale for the selection of a particular collection of local schemes for comparison against a national target. As Counsel for the Secretary of State put it pithily, it does not matter whether the emissions are from a road in Norfolk or in Oxford because their impact is the same and the target against which they are being assessed is a national, not local, target."</p> <p>Paragraph 44 of the CoA judgement refers to paragraph 84 of the High Court judgement which explained that no part of the legislative framework deals with "the acceptability of an effect identified by environmental information. That is a matter of judgement for the decision-maker, not a hard-edged point of law". The CoA also cite the decision of <i>Holgate J in R (GOESA Ltd) v Eastleigh Borough Council [2022] EWHC 1221 (Admin)</i> and paragraph 123 which expressly confirmed "on the basis of current policy and law it is permissible for a planning authority to look at the scale of the GHG emissions relative to a national target and to reach a judgement, which may inevitably be of a generalised nature, about the likelihood of the proposal harming the achievement of that target".</p> <p>Paragraph 48 of the CoA judgment, it was noted that "<i>nor is there any challenge to the choice of the national carbon budgets as the appropriate comparator</i>" and therefore the CoA were not expressly considering the appropriateness of the use of national over local comparators.</p> <p>Paragraph 50 of the CoA judgement confirms that "Dr Boswell [did] not challenge the scientific fact, reflected in the IEMA Guidance, that carbon emissions have no geographical boundary, with the consequence that their impact is not confined to the local area but is felt uniformly across the globe". It was therefore the "special character of carbon emissions which led the SoS to conclude that the only meaningful comparator for the cumulative effects of carbon emission from the proposed Scheme was the national carbon budgets".</p> <p>Paragraph 53 of the CoA judgment confirms that "<i>In accordance with the well-known authorities reviewed by the Judge, these were all issues of fact and evaluation for the decision maker, and (as such) they are subject only to the supervisory oversight of the court. In common with the Judge, and like Holgate J in GOESA, I find myself unable to identify any hard-edged provision in the relevant legislation, or any relevant principle of law, which was breached by the Secretary of State in coming to these conclusions.</i>"</p>
28	Provide detail of the sensitivity tests undertaken relating to climate resilience.	Applicant	D4	<p>The Applicant confirms the drainage design associated with the Scheme has been developed in accordance with the National Highways standard DMRB CG 501 The Design of Highway Drainage Systems. Full details of the drainage strategy are provided in Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122]. Section 2 of Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122] considers the design criteria applied to the development of the drainage design for the Scheme. This includes the consideration of future climate change impacts.</p> <p>DMRB CG 501 requires the consideration of controlled flooding during the 1 in 100-year (plus climate change) rainfall event whereby flows are maintained within the carriageway and directed towards a low flood risk zone. Whilst DMRB CG 501 includes the 1 in 100-year (plus climate change) event, the standard also requires sensitivity testing to be carried out. This sensitivity testing allows for a range of impacts between different climate change risk scenarios to be understood.</p> <p>For the design of carriageway drainage, a climate change allowance of 20% has been applied to the 1 in 100-year rainfall event in accordance with DMRB CG 501, together with a 40% uplift in peak rainfall intensity. The Environment Agency (2022) Flood risk assessment: climate change allowances guidance gives a 30% uplift in the peak rainfall to be considered for a 1 in 100-year rainfall event owing to the location of the Scheme.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>Both climate change allowances (30% for design and 40% for sensitivity testing) have been considered in the assessment of the drainage design and the assessment of the exceedance flow in the 1 in 100-year rainfall event.</p> <p>The results of the sensitivity test are provided in Section 8.4 of Appendix 13.7 Drainage Strategy Report of the Environmental Statement Appendices [APP-122], providing a comparison between the two climate change scenarios (30% and 40%). The sensitivity test indicates that the 40% climate change uplift scenario does not result in substantial impact to the performance of the new drainage network. For the 1 in 100-year rainfall event, the additional volumes produced as a result of the increase due to climate change is contained within the freeboard of the attenuation ponds and the increase of volume in the highway is kept inside the highways boundary.</p>
29	Confirm if there is a section of the National Policy Statement for National Networks (NPSNN) 2015 which supports the approach being undertaken in relation to the proposed environmental mitigation.	Applicant	D4	<p>During ISH2, the Applicant clarified that environmental mitigation proposed for the Scheme is related to the avoidance of significant adverse effects to environmental receptors and relates to the assessment presented within the Environmental Statement relating to the Scheme.</p> <p>This approach is supported by Paragraph 5.25 of the NPS NN(2015) which states that, <i>'As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.'</i></p> <p>Biodiversity offsets are defined in footnote 75 on the NPS NN 2015 as <i>'measurable conservation outcomes resulting from actions designed to compensate for residual adverse biodiversity impacts arising from a development after mitigating measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity.'</i></p> <p>Also of relevance is Paragraph 5.33 of the NPS NN 2015 which states that, <i>'Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.'</i></p> <p>Lastly, Paragraph 5.36 of the NPS NN 2015 states that, <i>'Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how these will be secured. In particular, the applicant should demonstrate that:</i></p> <ul style="list-style-type: none"> <i>• during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;</i> <i>• during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised (including as a consequence of transport access arrangements);</i> <i>• habitats will, where practicable, be restored after construction works have finished;</i> <i>• developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable;</i> <i>• opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge.'</i> <p>The Applicant considers that the approach adopted and the environmental mitigation proposed by the Scheme accords with these policies. Further details regarding compliance with the NPS NN can be found in the National Policy Statement for National Networks Accordance Tables [APP-147].</p>
30	Provide in writing the evidence supplied orally during the hearing detailing the reasons why the location and scale of the environmental mitigation to the land to the north-east of M60 Junction 18 is required and why it is considered that other locations would not be suitable.	Applicant	D4	<p>The Applicant clarified their position on biodiversity net gain (BNG) with respect to the Scheme at the ISH2 held on 28 November 2024. The environmental mitigation shown on Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057] is related to the avoidance of significant adverse effects to environmental receptors and relates to the assessment presented within the chapters of the Environmental Statement. The Applicant notes Interested Parties' comments with respect to biodiversity net gain (BNG) and is in agreement that there is no statutory requirement for the Scheme to deliver BNG as reflected in the Applicant's Response to Deadline 1 Submission, table reference REP1-040b [REP2-007]. The Applicant does however need to mitigate impacts to receptors to ensure significant adverse effects are avoided where possible. This includes impacts to receptors both within the Order Limits (such as loss of habitat) and to mitigate impacts to receptors outside the Order Limits (for example visual impacts to receptors outside of the Order Limits).</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>Although there is no statutory requirement to deliver BNG, the Applicant has undertaken a BNG assessment (presented within Appendix 8.12 Biodiversity Net Gain Report of the Environmental Statement Appendices [APP-102]) as it was anticipated that this would be encouraged by Interested Parties such as Natural England and Bury Metropolitan Borough Council, as reflected in the Applicant's Statement of Common Ground with Natural England [REP1-017] and the Applicant's Statement of Common Ground with Bury Metropolitan Borough Council [REP2-009], and so a BNG assessment has been included within the application for development consent.</p> <p>The Applicant explained the justification for the environmental mitigation areas shown on Sheet 2 and 3 of Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057], within the north-east quadrant (Land Plans [REP3-004] plot references 2/16a, 2/16b, 2/16d).</p> <p>Construction of the Scheme will result in impacts to biodiversity and visual and landscape receptors which require essential mitigation. Some features of the mitigation within the north-east quadrant need to be delivered in a specific location to be effective. Within this part of the Scheme the following are of relevance:</p> <p>Bats</p> <p>The Applicant has undertaken a suite of bat surveys to determine the baseline for the Scheme to inform the assessment presented within Chapter 8 Biodiversity of the Environmental Statement [REP3-010]. Bat survey data is presented in Appendix 8.3 Bat Survey Report of the Environmental Statement Appendices [APP-091]. Figure 8.3.3 of Appendix 8.3 Bat Survey Report [APP-091] presents a visualisation of the bat activity recorded during surveys; this figure shows that there is an area of higher bat activity which correlates with hedgerows within the Order Limits along Egypt Lane.</p> <p>Chapter 8 Biodiversity of the Environmental Statement [REP3-010] identifies potential impacts to bats in this part of the Scheme in relation to construction and operation.</p> <p>As set out in Paragraph 8.10.109 of Chapter 8 Biodiversity of the Environmental Statement [REP3-010], construction of the Scheme would require removal of 0.88km of hedgerows used by low numbers of common bat species, which could result in an impact to bats due to fragmentation of habitats. Page 5 of 10, of Figure 8.1.5 in Appendix 8.1 UK Habitat Classification Report of the Environmental Statement Appendices [APP-089], compared with Sheet 3 of the Environmental Masterplan of the Environmental Statement Figures [APP-057], allow visualisation of the locations of existing hedgerows which would be removed during construction of the Northern Loop.</p> <p>As set out in Paragraph 8.10.247 of Chapter 8 Biodiversity of the Environmental Statement [REP3-010]) there is potential for increased mortality to bats from collision with vehicles during operation of the Northern Loop.</p> <p>The Applicant has proposed essential mitigation for these impacts to bats. As stated in Paragraph 8.10.110 of Chapter 8 Biodiversity of the Environmental Statement [REP3-010] and shown on Sheet 3 of Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-057], the landscaping design incorporates replacement hedgerow habitat. Firstly, a length of habitat is proposed running north to south on Egypt Lane. This would provide connectivity between retained hedgerows running east to west along Egypt Lane, and broadleaved woodland habitat along the M60. Secondly, hedgerow is proposed to the east of the Northern Loop which would provide north-south connectivity from Egypt Lane to Pike Fold Golf Course. This would guide bats and other wildlife around the Northern Loop, and would reduce the risk of collision with vehicles on the Northern Loop during operation of the Scheme.</p> <p>Attenuation Pond 1</p> <p>With the installation of drainage attenuation Pond 1, there is a requirement for landscape planting to integrate the pond into the local landscape and to maximise its benefit to biodiversity. The Applicant has achieved this through inclusion of marginal planting and wet grassland within the design.</p> <p>Although it is not a primary reason for its location, by siting the pond outside of the Northern Loop, there is an additional benefit to wildlife as the pond is more accessible to wildlife. If the pond were to be sited within the Northern Loop, it would then be fragmented by the highway, which would pose a barrier to wildlife using it.</p> <p>Further details regarding the reasoning for the design and siting of Pond 1 can be found in the Applicant's response to CAH1 Action Point 2 above.</p> <p>Impacts to Landscape Character</p> <p>The Applicant has undertaken an assessment of landscape effects which is presented in Appendix 7.3 Schedule of Landscape and Townscape Effects of the Environmental Statement Appendices [APP-084] with the reporting of those effects in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046]. The north-east quadrant is located within Landscape Character Area (LCA) 26: Prettywood, Pilsworth and Unsworth Moss as described in the Greater Manchester Landscape Character and Sensitivity Assessment (GMCA, 2018) and shown on Figure 7.4 Landscape and Townscape Character Areas of the Environmental Statement Figures [APP-066]. Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] identifies potential impacts to landscape character in this part of the Scheme in relation to construction and operation.</p> <p>Impacts on LCA 26 during construction are described in paragraphs 7.10.7 to 7.10.12 of Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and include the removal of a mature highway vegetation belt north-east of M60 J18 on the M66 southbound verge. The removal of vegetation</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>would alter the relatively enclosed character of this part of the LCA. The assessment concludes that there would be a moderate adverse significance of effect on LCA 26 during construction, due in part to the removal of areas of vegetation.</p> <p>Impacts on LCA 26 during operation year 1 (Opening Year) are described in paragraphs 7.10.26 and 7.10.27 of Chapter 7 Landscape and Visual of the Environmental Statement [APP-046]. Reinstatement planting would include intermittent trees and shrubs to help screen or integrate the new infrastructure, and wetland and marginal habitat creation at the ponds, and new woodland planting within the national highway embankments to provide separation and woodland cover characteristic of the M60 corridor. These measures are included in the Register of Environmental Actions and Commitments contained within the First Iteration of the Environmental Management Plan [REP3-014]. As stated in Commitment LV7 of the Register of Environmental Actions and Commitments 'Planting will be delivered to link existing field boundary vegetation with other areas of existing vegetation in areas around the Northern Loop to improve habitat links and strengthen the local landscape pattern and character.'</p> <p>The assessment of LCA 26: Prettywood, Pilsworth and Unsworth Moss has taken into consideration Bury Unitary Development Plan Policy ENV9/1 Special Landscape Area. This has now been replaced by a landscape character led approach in Places for Everyone Policy JP-G1 Landscape Character. The area is now covered by Area JPA1.1 Northern Gateway - Atom Valley. JP-G1 Landscape Character includes the statement that, 'well-considered interface of new development with the surrounding countryside /landscape [which is] of particular importance'. The Applicant considers that the landscaping design shown in Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057] has created a well-considered interface between the surrounding countryside and the Scheme with regard to the replacement of UDP Policy EN9/1 with PFE JP-G1.</p> <p>Visual impacts to residents, walkers, and visitors to Pike Fold Golf Course</p> <p>The Applicant has undertaken an assessment of visual effects which is presented in Appendix 7.4 Schedule of Visual Effects of the Environmental Statement Appendices [APP-085] with the reporting of those effects in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046]. The approach to identification of representative viewpoints has followed the methodology in the National Highways standard DMRB LA 107 Landscape and Visual Effects. Figure 7.2 Zone of Theoretical Visibility with Screening Features of the Environmental Statement Figures [APP-066] identifies the theoretical maximum extents to which the development may be visible from within 5km of the Order Limits. For the ZTV with screening features the screening effects of buildings and trees modelled to a height of 10m. Further information on the methodology is provided in Appendix 7.1 Landscape and Visual Impact Assessment Methodology of the Environmental Statement Appendices [APP-082].</p> <p>Visual impacts that are relevant to the land to the north-east of M60 Junction 18 comprise residents, walkers on footpaths and visitors to Pike Fold Golf Course (VP1, VP2, VP3, VP4, VP5 and VP7). Location of viewpoints have been guided by the zone of theoretical visibility (ZTV) modelling shown on Figure 7.2 Zone of Theoretical Visibility with Screening Features of the Environmental Statement Figures [APP-066]. Figure 7.6: Representative Viewpoints 1-10 of the Environmental Statement Figures [APP-063] show views from the representative viewpoints in winter and summer.</p> <p>Impacts during construction are identified in Table 7.7 of Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and assessed in Appendix 7.4 Schedule of Visual Effects of the Environmental Statement Appendices [APP-085]. The location of the representative viewpoints are shown on Figure 7.5 Representative Viewpoints and Photomontage Locations of the Environmental Statement Figures [APP-066].</p> <p>Of the representative viewpoint locations described above, receptors at VP3, VP5 and VP7 would experience moderate adverse significance of effect or greater during construction. This in part would be due to loss of vegetation which would alter the view.</p> <p>During operation receptors in locations VP3, VP5 and VP7 would experience a moderate adverse significance of effect due to views of the Northern Loop and Simister Pike Fold Bridge and views of moving traffic on the elevated structures. Mitigation planting on the Simister Pike Fold Bridge embankments and Northern Loop embankments and within the Northern Loop are proposed to deliver visual screening and landscape integration and as shown on Figure 7.7 Photomontage PM1 [REP3-013].</p> <p>Visual screening is located close to the source of the impact to most effectively mitigate visual impacts. Therefore, the essential mitigation is located on the Northern Loop and the Simister Pike Fold Bridge embankments, reducing the effects to at VP3, VP5 and VP7 to slight adverse by year 15.</p> <p>Landscape integration</p> <p>Lastly, related to landscape impacts, is the general integration of the Northern Loop within the local landscape through provision of, in particular, woodland planting on the Northern Loop, Simister Pike Fold Viaduct and the Simister Pike Fold Bridge embankments.</p> <p>In addition to these mitigation measures which have to be within the north west quadrant to be effective, the Scheme also needs to mitigate the general loss of habitats including lowland mixed deciduous woodland (priority habitat), broadleaved woodland, modified grassland, other neutral grassland and scrub (Table 8.17, Chapter 8 Biodiversity [REP3-010]).</p> <p>Other</p> <p>As explained in the Applicant's Response to Relevant Representation [REP1-020], the Applicant has located environmental mitigation within land that is required for temporary works. The ability to control and manage the remediation of this land will enable the Applicant to ensure the optimum conditions for establishment of this mitigation planting.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>In addition, by using these temporary works areas for essential environmental mitigation, the overall land take for the Scheme is reduced compared to siting environmental mitigation outside of these areas.</p> <p>Lastly, by siting areas of habitat creation in and around mitigation for specific receptors/impacts (bats, drainage, visual impacts), the Applicant maximises the value of these habitats as it is an established ecological principle (Making Space for Nature, Lawton 2010) that habitats which are bigger are more valuable compared to multiple smaller fragments of an equivalent total size.</p> <p>For the reasons outlined above the Applicant considers that the design presented on Figure 2.3 Environmental Masterplan of the Environmental Statement Figures [APP-057] is the optimum solution for environmental mitigation.</p>
31	Provide a written submission of the evidence supplied orally during the hearing detailing the reasons why it is considered the location and scale of the environmental mitigation proposed to be implemented within plots 2/16b and 2/16d is not appropriate. Applicant to respond at D5.	The Hilary Family (represented by Mr Chris Stroud) and Applicant	D4 and D5	
32	Provide a written submission of the evidence supplied orally during the hearing detailing the concerns regarding the use of plots 2/16b and 2/16d to provide landscaping/screening which is proposed to reduce significant visual effects at visual receptors (VP3, VP4, VP5 and VP7). Applicant to respond at D5.	The Hilary Family (represented by Mr Chris Stroud) and Applicant	D4 and D5	
33	Provide further details and submit a copy of the scheme-wide lighting assessment referred to in paragraph 2.5.38 and the lighting appraisal referred to in paragraph 2.5.39 in ES Chapter 2 [APP-041].	Applicant	D4	<p>The Applicant refers to the wording in paragraphs 2.5.38 and 2.5.39 of Chapter 2: The Scheme of the Environmental Statement [APP-041]. The “<i>Scheme wide lighting assessment</i>” as cited in paragraph 2.5.38 is part of the overall lighting appraisal undertaken in line with Design Manual for Roads and Bridges (DMRB) TA501 – Road Lighting Appraisal process. For clarity, the two documents cited in the action description are not separate documents. The TA501 sets out the process for the appraisal of new and replacement road lighting for motorways and all-purpose trunk roads. It specifically addresses the high-level approach for lighting requirements of specific motorway links e.g. identifies the lighting class needed for the 5-lane cross section of the M60 between Junction 17 and 18 which might require a different classification to that of the interchange link between the M60 eastbound and M60 southbound. The primary purpose of road lighting for motorways and all-purpose trunk roads is to reduce personal injury collisions (PICs). It should be noted that the technical appraisal of how the Scheme is to be lit in terms of lighting classification, is separate to the environmental impact assessment of the impact that lighting has on nearby receptors.</p> <p>The landscape and visual assessment of the Scheme in respect of street lighting impacts was based on the Scheme being fully lit as per the findings of the TA501 - Road Lighting Appraisal, with which the Scheme is compliant.</p>
34	Explain how the landscape and visual impact assessment has taken into account any findings within the lighting assessments referred to in action point 33 and whether an assessment was undertaken of the receptors that would be most susceptible to impacts from lighting.	Applicant	D4	<p>The Applicant confirms that night-time changes for landscape and visual receptors have been considered as part of the landscape and visual impact assessment (LVIA) in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046]. The assessment has followed the standard approach in the Design Manual for Roads and Bridges (DMRB) LA 107 Landscape and Visual Effects, paragraph 2.6, to consider the ‘<i>potential effects of both day and night-time situations</i>’. As such, the impacts from lighting is considered as an element of, and incorporated into, the LVIA assessment as a qualitative assessment. The LVIA has taken into consideration information on the lighting design described in paragraphs 2.5.39 and 2.5.41 of Chapter 2: The Scheme of the Environmental Statement [APP-041], which has confirmed that the Northern Loop, mainline and M60 J18 should be lit. Therefore, the approach to lighting in the LVIA has assessed all receptors similarly and not undertaken an assessment of receptors that would be most susceptible to impacts from lighting.</p> <p>The impacts from lighting are described and assessed in Chapter 7 Landscape and Visual of the Environmental Statement [APP-046], Appendix 7.3 Schedule of Landscape and Townscape Effects of the Environmental Statement Appendices [APP-084] and Appendix 7.4 Schedule of Visual Effects of the Environmental Statement Appendices [APP-085]. Photomontages have been developed for Year 1 (2029) when planting has been implemented and</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>Year 15 (2044) when planting has sufficiently established to provide mitigation for day time views and night time lighting where possible, and landscape integration. The retained or proposed lighting columns are shown in the photomontages in Figure 7.7 Photomontages of the Environmental Statement Figures [REP3-013].</p> <p>The LVIA has been proportionate to the lit environment baseline described in paragraph 7.7.20 of Chapter 7 Landscape and Visual of the Environmental Statement [APP-046] and its influence on landscape character and visual amenity, and notes: <i>'The night-time landscape is heavily influenced by the lighting of the existing M60 J18 and mainline M60, M62 and M66. The surrounding area is predominantly residential with lit residential streets'</i>, and paragraph 7.7.28 which notes <i>'Motorway lighting is visually prominent from urban areas located near the motorway corridors and M60 J18 and from the more undeveloped rural area to the east.'</i></p> <p>Figure 2.3: Environmental Masterplan of the Environmental Statement Figures [APP-057] shows woodland planting, tree and shrub planting to reduce landscape and visual impacts and are also located to reduce the impacts of light spill from Scheme lighting and the influence from vehicle headlights using the Scheme. Areas of highway tree belts along the mainline between approximate chainage (Ch.) 1900 at Sandgate Lane and Ch.2600 removed during construction and shown in Annex C Tree Removal Plans of Appendix 7.5 Arboricultural Impact Assessment of the Environmental Statement Appendices [APP-086] would be reinstated with a higher percentage of feathered trees and evergreen species. This would improve visual screening in the early years.</p> <p>Commitment LV13 in the Register of Environmental Actions and Commitments, contained within the First Iteration Environmental Management Plan [REP1-010], states that: <i>'Existing linear tree belts necessitating removal for carriageway widening would be reinstated with a higher percentage of feathered trees and evergreen species'</i> to be sensitive to landscape character and visual amenity, and to improve visual screening in the early years. In areas of planting adjacent to residential areas along the M60 mainline, where loss of vegetation will significantly affect views, Appendix N: Outline Landscape & Ecology Management Plan [APP-141], states that <i>'Tree and shrub plant stock will predominantly be supplied as transplants with a percentage of feathered trees used in most planting mixes. Selected standard trees (10-12cm girth) would be considered for tall screen planting; standard trees (8-10cm girth) for individual tree planting; and feathered trees in intermittent trees planting.'</i></p>
35	Consider if a new requirement should be added to the dDCO requiring the details of the final design for the netting to Pike Fold Golf Course to be approved by the SoS following consultation with BMBC to ensure that impacts of any netting would be minimised.	Applicant and BMBC	D5	
36	Provide more detail regarding the 'less than substantial harm' that would arise to the heritage significance of Heaton Park Registered Park and Garden.	Applicant	D4	<p>In Table 6.10 of Chapter 6 Cultural Heritage of the Environmental Statement [APP-045] some limited inter-visibility was identified from some viewpoints within Heaton Park Registered Park and Garden (RP&G) (NHLE 1000854) and the Scheme. Changes to setting arising from construction activity around Ponds 4 and 5 were attributed a negligible adverse impact using the National Highways standard Design Manual for Roads and Bridges (DMRB) LA 104 magnitude of impact criteria. This reflects the potential visual intrusion from pond creation into small, discrete areas within the designated parkland. Using the DMRB LA 104 significance matrix (Table 3.8.1) reproduced in Table 4.7 Chapter 4: Environmental Assessment Methodology [APP-043], negligible adverse impacts can result in slight adverse effects on an asset attributed a medium value. A worst-case scenario was assumed in applying this score to setting change on asset value, and a slight adverse effect identified, which is not significant.</p> <p>The adverse (non-significant) effect would equate to 'less than substantial harm' in terms of the NPS NN (2015) (paragraphs 5.134 and 5.135). In terms of changes to setting adversely affecting an asset's significance, a significant adverse effect would equate to a moderate or high degree of change to setting, compromising a heritage asset's legibility or appreciation. The temporary changes to Heaton Park RP&G during construction would be minimal, warranting (at most) 'less than substantial harm' to the asset as set out in the NPS NN (2015).</p> <p>The changes to visual and historic setting during the operational phase will be similarly minimal, as indicated in paragraph 6.10.8 and Table 6.11 of Chapter 6 Cultural Heritage of the Environmental Statement [APP-045]. The slight adverse effect arising would not be significant and warrants 'less than substantial harm' to the asset.</p> <p>The visual changes to setting will be very limited as will the historic changes, within the context of setting to Heaton Park RP&G in the modern period. The RP&G has experienced: the creation of a golf course in the 1920s, Heaton Park Reservoir, the existing motorway layout, and the encroachment of an urban environment around the asset.</p> <p>The Applicant takes 'less than substantial harm' to represent a wide range of effects covering asset value changes from minimal to moderate, stopping short of large-scale loss of legibility or appreciation, which would be substantial. In this context, the 'less than substantial harm' attributed to Heaton Park</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				RP&G both during construction and operation is very much on the lower end of the harm scale, being much closer to 'no harm' than 'substantial harm', given that the magnitude of impact to the setting of the asset is negligible (during construction) and minor (during operation).
37	Provide more detail regarding the 'less than substantial harm' that would arise to the heritage significance of Brick Farmhouse during construction.	Applicant	D4	<p>The Applicant confirms the 'less than substantial' harm on Brick Farmhouse (NHLE 1067266) will be confined to the construction phase. Table 6.8 of Chapter 6 Cultural Heritage of the Environmental Statement [APP-045] and paragraph 1.2.72 and Annex A of Appendix 6.1 Annex A Cultural Heritage Desk-Based Assessment [APP-081] states the inter-visibility of the Scheme west of the property. The creation of Pond 2 and the noise, dust and lighting will result in temporary change to the setting west of the property. Table 6.10 of Chapter 6 Cultural Heritage of the Environmental Statement [APP-045] quantifies these changes as being minor adverse on the listed building, using the Design Manual for Roads and Bridges (DMRB) LA 104 magnitude of impact criteria. A high asset value is given to Brick Farmhouse, as per Table 6.7 of Chapter 6 Cultural Heritage of the Environmental Statement [APP-045]. The significance of effect is calculated from the DMRB LA 104 significance matrix (Table 3.8.1) reproduced in Table 4.7 Chapter 4: Environmental Assessment Methodology [APP-043]. The minor adverse impact on an asset of high value would result in a temporary slight adverse effect, which would not be significant. The score of slight adverse was arrived at in consideration of the distance of the asset from the Order Limits (330m) and the limited proportion of the Listed Building with a visual relationship with the construction activity.</p> <p>The adverse (non-significant) effect would equate to 'less than substantial harm' in terms of the NPS NN (2015) (paragraphs 5.134 and 5.135). In terms of changes to setting adversely affecting an asset's significance, a significant adverse effect would equate to a moderate or high degree of change compromising a heritage asset's legibility or appreciation. The temporary changes to the setting of Brick Farmhouse during construction would be limited by the distance of the working area from the property (330m). Similarly, only the western side of the property would be affected by the temporary setting change.</p> <p>The Applicant takes 'less than substantial harm' to represent a wide range of effects covering asset value changes from minimal to moderate, stopping short of large-scale loss of legibility or appreciation, which would be substantial. In this context, the 'less than substantial harm' attributed to Brick Farmhouse is very much on the lower end of the scale, and much closer to 'no harm' than 'substantial harm'.</p> <p>No adverse effects to Brick Farmhouse were identified in the operational phase, as stated in Table 6.11 of Chapter 6 Cultural Heritage of the Environmental Statement [APP-045]. No harm will occur to Brick Farmhouse during the operational phase.</p>
38	Provide in writing the evidence supplied orally in the hearing detailing how the locations of the boundaries between each of the land types as shown in Figure 9.3 [APP-069] was determined.	Applicant	D4	<p>As reported in paragraph 9.7.41 of Chapter 9 Geology and Soils of the Environmental Statement [APP-048], the determination of agricultural land classification (ALC) grades was undertaken in accordance with Natural England (2012) Technical Information Note TIN049 Agricultural Land Classification: protecting the best and most versatile agricultural land, which in turn references the full grading system in Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land (MAFF, 1988). These guidelines are also cited in Appendix 9.2 Agricultural Land Classification Survey Report of the Environmental Statement Appendices [APP-107], which provides further details on the methodology.</p> <p>Figure 9.3 Agricultural Land Classification of the Environmental Statement [APP-069] is based on the Map 3 of Appendix 9.2 Agricultural Land Classification Survey Report of the Environmental Statement Appendices [APP-107]. The mapping of ALC grades into distinct units and the boundaries between them was undertaken using professional judgement, based primarily on the ALC grading of individual survey points (determined in accordance with the guidance cited above), but also informed by supplementary information such as the distribution of soil types, topographical mapping, aerial imagery and site observations. The individual survey points were scheduled following the intersections of a 100m rectilinear grid with micro-siting as required to achieve a sufficiently representative distribution. This approach follows industry standard practice for detailed site-specific ALC assessments. As per Issue Reference 2.1 of The Statement of Common Ground with Natural England [REP1-017], Natural England reviewed the ALC information presented in the Environmental Statement and had no comment on the mapping of grades.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken																								
39	Provide details of the typical life spans of low and very low noise surfacing proposed to be used on this Scheme. Provide a comparison of these life spans to conventional non noise reducing surfacing.	Applicant	D4	<p>The Applicant provides the typical life spans for different pavement layers and types of surfacing outlined in the table below.</p> <table border="1"> <thead> <tr> <th>Pavement Layer</th> <th>Material</th> <th>Typical Material Service Life</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Surface Course</td> <td>Hot Rolled Asphalt (Conventional non-noise reducing surface)</td> <td>20 years</td> </tr> <tr> <td>Low Noise Surface (thin surface course system)</td> <td>15 years</td> </tr> <tr> <td>Very low noise surface (thin surface course system)</td> <td>15 years</td> </tr> <tr> <td rowspan="3">Binder Course</td> <td>Hot Rolled Asphalt (Conventional non-noise reducing surface)</td> <td>All 30 years</td> </tr> <tr> <td>Low Noise Surface (thin surface course system)</td> <td></td> </tr> <tr> <td>Very low noise surface (thin surface course system)</td> <td></td> </tr> <tr> <td rowspan="3">Base</td> <td>Hot Rolled Asphalt (Conventional non-noise reducing surface)</td> <td>All 40 years</td> </tr> <tr> <td>Low Noise Surface (thin surface course system)</td> <td></td> </tr> <tr> <td>Very low noise surface (thin surface course system)</td> <td></td> </tr> </tbody> </table>	Pavement Layer	Material	Typical Material Service Life	Surface Course	Hot Rolled Asphalt (Conventional non-noise reducing surface)	20 years	Low Noise Surface (thin surface course system)	15 years	Very low noise surface (thin surface course system)	15 years	Binder Course	Hot Rolled Asphalt (Conventional non-noise reducing surface)	All 30 years	Low Noise Surface (thin surface course system)		Very low noise surface (thin surface course system)		Base	Hot Rolled Asphalt (Conventional non-noise reducing surface)	All 40 years	Low Noise Surface (thin surface course system)		Very low noise surface (thin surface course system)	
Pavement Layer	Material	Typical Material Service Life																										
Surface Course	Hot Rolled Asphalt (Conventional non-noise reducing surface)	20 years																										
	Low Noise Surface (thin surface course system)	15 years																										
	Very low noise surface (thin surface course system)	15 years																										
Binder Course	Hot Rolled Asphalt (Conventional non-noise reducing surface)	All 30 years																										
	Low Noise Surface (thin surface course system)																											
	Very low noise surface (thin surface course system)																											
Base	Hot Rolled Asphalt (Conventional non-noise reducing surface)	All 40 years																										
	Low Noise Surface (thin surface course system)																											
	Very low noise surface (thin surface course system)																											
40	Explain why it is acceptable for waste generation for operation to be scoped out for this Scheme when the use of a material (low and very low noise surfacings) is proposed which may create more waste during operation.	Applicant	D4	<p>The Applicant confirms waste generation during operation has been scoped out of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] for the reasons outlined in the following paragraphs of the chapter:</p> <ul style="list-style-type: none"> ‘10.8.26 Paragraph 3.21 of DMRB LA 110 specifies that the assessment shall report on the first year of operational activities (opening year). It has been assumed that no significant operational maintenance activities would occur during the first year of operational activities on a newly constructed highway asset (target opening year 2029), and so there is not likely to be significant materials consumption or waste generation’. ‘10.8.27 Operational impacts have therefore been scoped out of the assessment on the basis that no likely significant effects would be realised. Although the opening year is a time period not necessarily confined to operational effects, any construction phase effects overlapping within this period are captured within the construction phase assessment. This was agreed by the Planning Inspectorate in the Scoping Opinion (TR010064/APP/6.7) (see Section 10.4 of this Chapter for further details)’. ‘10.8.28 Notwithstanding this, the design process would inherently seek to reduce the consumption and use of material assets, and the generation of waste throughout the life cycle of the Scheme. Design choices and the choice of materials would make a significant contribution to reducing the environmental impacts associated with material assets and waste during operation, by influencing the required method and frequency of maintenance, and facilitating opportunities to recover and regenerate materials and products at the end of first life’. ‘10.8.29 It is also assumed that the assessment of any environmental impacts and effects associated with material assets and waste during any large-scale future maintenance, renewal or improvement works beyond the opening year would be undertaken by the Applicant in accordance with the requirements of DMRB LA 110 (or any future environmental assessment standard specified by National Highways)’. <p>Regarding the scoping out of operational impacts and effects, the Inspectorate provided the following comment in the Scoping Opinion [APP-144] on the Applicant’s proposal to scope out waste generation during operation in the Environmental Scoping Report [APP-143]:</p> <ul style="list-style-type: none"> ID 4.6.3 – ‘These matters are proposed to be scoped out of the assessment on the basis that maintenance activities would be undertaken in accordance with the requirements of DMRB LA110 and are not expected in the first year of operation (timescale defined by DMRB LA110) or beyond. The Inspectorate is content to agree to scope this matter out on this basis’. <p>Notwithstanding this, the greenhouse gas emissions resulting from the disposal of waste surfacing materials during the operational maintenance of the Scheme have been assessed in Chapter 14: Climate, of the Environmental Statement [APP-053], and its supporting Appendix 14.1: Estimation of Greenhouse Gas Emissions, of the Environmental Statement Appendices [APP-123]. As per paragraphs 3.11 and 3.11.1 of DMRB LA 114, greenhouse gas emissions associated with the Scheme have been estimated and reported for the operational phase over a 60-year appraisal period.</p>																								

Action	Description	Action by	When	Applicant Response & Summary of Action taken
41	Supply further detail on the issue of waste management for construction. Include whether landfill capacities have been considered as part of the cumulative impacts in relation to other schemes or developments which may also have landfill needs that coincide with the proposed scheme.	Applicant	D4	<p>Cumulative effects on material assets and waste have been scoped out of Chapter 15: Assessment of Cumulative Effects, of the Environmental Statement [APP-054] because they are inherently addressed within Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049], as detailed below. This scoping out was agreed with the Planning Inspectorate, as confirmed by the following response in the Scoping Opinion [APP-144] in relation to the Applicant's proposal in the Environmental Scoping Report [APP-143] to scope out cumulative effects on material assets and waste:</p> <ul style="list-style-type: none"> ID 4.11.1 – <i>'On the basis that the assessment proposed in the materials and waste aspect chapter will consider the impact of the Proposed Development on national material recovery targets, regional recycled aggregate targets, sub-regional minerals sterilisation and regional landfill capacity, the Inspectorate agrees that relevant consideration of cumulative effects will be inherent in that assessment. The Inspectorate therefore agrees that these can be scoped out of further specific consideration in the cumulative effects assessment.'</i> <p>Future landfill capacity projections have been forecasted using the methodology outlined in paragraphs 10.7.68 to 10.7.72 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049]. This methodology inherently considers historical trends in the subtraction and addition of landfill capacity in the second study area from 2005 to 2022, to develop the future baseline landfill capacities during the anticipated construction programme.</p> <p>Available landfill capacity at a given time, is a function of the capacity created by new or expanded landfill sites, and the void space occupied by waste deposited in existing landfill sites. The rate at which waste is deposited in existing landfill sites is dependent on multiple factors, but is directly linked to developments in the area served by the landfill. Therefore, the historical capacity data used inherently reflects the changes resulting from historical trends in other schemes and developments in the second study area.</p>
42	Provide evidence to demonstrate that the waste recovery percentages are appropriate.	Applicant	D4	<p>The Applicant considers that that the waste recovery percentages used in the assessment are appropriate on the basis of the rationale provided in the following paragraphs in Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049]:</p> <ul style="list-style-type: none"> <i>'10.10.22 To evaluate potential recovery rates of the main C&D waste streams against the significance category descriptions detailed in Table 10.8, indicative waste recovery rates have been established in Table 10.15 to determine the potential for waste to be diverted from landfill. These benchmarks have been selected through the application of professional judgement to the material-specific 'good practice' performance benchmarks provided in WRAP's (2007) Achieving Good Practice Waste Minimisation and Management guidance.'</i> <i>'10.10.23 Given the age of this data, good practice benchmarks, as opposed to standard or best practice benchmarks, have been selected in order to provide a reasonable and realistic worst case assessment scenario in line with the benchmark definitions provided in paragraph 10.10.6 of this chapter. The use of good practice benchmarks aligns with the implementation of those mitigation measures and targets identified in Section 10.9 of this chapter. These measures would be implemented to increase the quantity of waste reused, recycled or recovered on or off-site, thereby reducing off-site disposal to landfill.'</i> <i>'10.10.24 These benchmarks reflect the total percentage of a given material that is likely to be diverted from landfill on or off-site at good practice levels. While some degree of professional judgement has been used in assigning recovery rates to each material type, a validity review of the UK Statistics on Waste (Defra, 2023b) and landfill diversion rates on other highways and infrastructure schemes in the UK would suggest that these rates are likely to be achievable on the Scheme. If anything, these benchmarks are likely to provide a conservative estimate of Scheme performance, and it is likely that higher levels of waste recovery would be realised during construction.'</i> <i>'10.10.25 For example, waste records from the A19/A184 Testos Junction Improvement Scheme, which is similar in nature to the Scheme (a junction upgrade, one major flyover structure, similar footprint and comparable scheme value), confirms that this scheme achieved an overall waste recovery rate of 99.9%.'</i> <p>The Department for Environment, Food and Rural Affairs (Defra)'s (2024) UK statistics on waste provides an update on the generation and management of UK waste, including the contributions made by various sectors. This confirms that the construction sector in England generated a total of 63.0Mt of non-hazardous construction and demolition (C&D) waste in 2022 (the most recent year available), 94.4% of which was recovered / diverted from landfill. This percentage is considered to be sufficiently close to the average of the waste recovery rates (93.6%) that were used in Table 10.15 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] to estimate C&D waste recovery.</p> <p>Additionally, the Applicant requires, through the Design Manual for Roads and Bridges (DMRB) LA 110 Material Assets and Waste standard, that its projects should aim to achieve at least 90% (by weight) material recovery of non-hazardous C&D waste from landfill. This target is likely to be met by the Principal Contractor (Costain), as Costain's 2023 Environmental, Social, and Governance Report confirms that over 99% of the waste produced from its projects in 2023 was diverted from landfill through reuse or recycling. The report also highlights that it has consistently achieved high levels of waste diversion from landfill for several years.</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
				The requirement to divert at least 90% of non-hazardous C&D waste from landfill is expressed in Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] and is included in commitment M5 in the Register of Environmental Actions and Commitments (REAC) contained within the First Iteration Environmental Management Plan [REP3-014].
43	Explain how far waste may need to be transported if there was not sufficient capacity in the Greater Manchester sub region and explain how this has been accounted for in the transport assessment.	Applicant	D4	<p>Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] has assessed that the Greater Manchester sub-region is likely to have sufficient available landfill capacity to accept the inert and non-hazardous waste that is forecast to be generated during the construction of the Scheme.</p> <p>Furthermore, the ancillary discussion provided in paragraphs 10.10.41 to 10.10.45 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] <i>'indicates that the Scheme is likely to have a negligible bearing on regional and sub-regional waste recovery and disposal facilities. It is therefore considered unlikely that the construction of the Scheme would, in isolation would create a scenario where there is a consequential increase in annual quantities of C&D waste managed at regional and sub-regional recovery and disposal sites that goes beyond 'business as usual'.</i></p> <p>In contrast to other environmental aspects, impacts from the production and disposal of waste, such the use of landfill capacity, are largely dispersed or generalised, rather than affecting specific geographically-bound receptors. Notwithstanding this, should waste need to be managed outwith the Greater Manchester sub-region then this has been accounted for and the following allowances have been made:</p> <ul style="list-style-type: none"> Paragraph 2.4.1 of Appendix 14.1: Estimation of Greenhouse Gas Emissions, of the Environmental Statement Appendices [APP-123] states that: <i>'In the absence of specific information, the transportation distance for waste materials disposed of off-site has been assumed to be 50km, plus 2.5km to account for the transport of waste from working areas to site entry/exit points'.</i> <p>Construction site traffic is not reported in the Transport Assessment [APP-149] as these are low flows in Annual Average Daily Traffic terms. The focus of the construction chapter of the Transport Assessment [APP-149] is on the change in general traffic routeing and speeds due to the construction traffic management measures. However, the environmental assessment of the construction period reported in multiple aspect chapters of the Environmental Statement uses traffic flows that include both general traffic impacts and construction site traffic.</p>
44	Explain why it is acceptable that the disposal of hazardous waste quantities has not been considered in the ES when all hazardous waste produced, regardless of the amount, will need to be transported out of the Greater Manchester sub region.	Applicant	D4	<p>The Applicant confirms while paragraphs 10.8.21 and 10.8.22 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] have qualified the likely production of hazardous waste during the construction of the Scheme, the Applicant acknowledges that the chapter does not quantify hazardous waste production and disposal for the reasons outlined below.</p> <p>No substantial quantities of hazardous waste are expected, during the construction of the Scheme, based on the ground conditions reported in Chapter 9: Geology and Soils, of the Environmental Statement [APP-048]. Furthermore, paragraph 10.10.19 of Chapter 10: Material Assets and Waste of the Environmental Statement [APP-049] states that:</p> <ul style="list-style-type: none"> <i>'Construction of the Scheme would also generate waste streams from offices, welfare facilities, material packaging, construction plant maintenance and miscellaneous hazardous wastes. The quantities are anticipated to be small compared to the main C&D waste streams summarised in Table 10.15, and have not been included given the limited quantities that are anticipated'.</i> <p>Notwithstanding this, given that the North West is forecast to have 4,274,171tpa of average available hazardous landfill capacity between 2026 and 2029, the Scheme would need to dispose of greater than 42,742t of hazardous waste to landfill to realise a likely significant effect according to the DMRB LA 110 significance category descriptions and significance criteria provided in Tables 10.8 and 10.9 respectively of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049]. This is highly unlikely on the basis that the Scheme is only forecast to dispose of 23,181t of total inert and non-hazardous C&D waste.</p> <p>The Applicant would also like to reiterate that the second study area for waste is the North West region, and not the Greater Manchester sub-region as detailed in Section 10.6 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049]. While Section 10.7 of this chapter provides a degree of sub-regional baseline assessment, the assessment of likely significant effects provided in Section 10.10 of this chapter has been solely based on the North West region as the second study area for waste.</p> <p>Although a degree of ancillary subregional discussion has been included in Section 10.10 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049], this does not form the central basis of the assessment of likely significant effects for this aspect, which has been undertaken in accordance with DMRB LA 110 at a regional level (i.e. North West). This ancillary discussion was largely provided to assist the Minerals and Waste Planning Authority (i.e. the Greater Manchester Combined Authority) in understanding the influence of the Scheme on primary aggregates consumption and waste production and disposal at a sub-regional level (i.e. Greater Manchester).</p>

Action	Description	Action by	When	Applicant Response & Summary of Action taken
47	Provide further detail on the likely vehicle movements associated with hauling materials and how this has been accounted for in the transport assessment.	Applicant	D4	<p>The Applicant has identified bulk material (earthworks materials, pavements and concrete) movements using the preliminary design information to quantify the Scheme's material import and export requirements. These material quantities have been assigned to vehicle movements and allocated to individual activities within the construction programme. This then allows an estimate to be derived for the total number of construction haulage vehicle movements across each individual programme phase and across the entire scheme duration. It is estimated that the Annual Average Daily Traffic of vehicle movements associated with materials haulage is around 45 vehicles per day (inbound + outbound).</p> <p>Construction site traffic is not reported in the Transport Assessment [APP-149] as these are low flows in Annual Average Daily Traffic terms. The focus of the construction chapter of the Transport Assessment [APP-149] is on the change in general traffic routing and speeds due to the construction traffic management measures. However, the environmental assessment of the construction period reported in multiple aspect chapters of the Environmental Statement use traffic flows that include both general traffic impacts and construction site traffic. In order to generate these construction site traffic flows, assumptions were made on their routing through the network and on which parts of the site they will serve and travel between.</p>
48	Advise whether the worst-case material requirements have been considered as part of the cumulative impacts in relation to other schemes or developments which may also have material needs that could coincide with the construction of the proposed Scheme.	Applicant	D4	<p>Cumulative effects on material assets and waste have been scoped out of Chapter 15: Assessment of Cumulative Effects, of the Environmental Statement [APP-054] because they are inherently addressed within Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049]. This was agreed with the Planning Inspectorate through the following comment in the Scoping Opinion [APP-144] in relation to the Applicant's proposal in the Environmental Scoping Report [APP-143] to scope out cumulative effects on material assets and waste:</p> <ul style="list-style-type: none"> <i>ID 4.11.1 – On the basis that the assessment proposed in the materials and waste aspect chapter will consider the impact of the Proposed Development on national material recovery targets, regional recycled aggregate targets, sub-regional minerals sterilisation and regional landfill capacity, the Inspectorate agrees that relevant consideration of cumulative effects will be inherent in that assessment. The Inspectorate therefore agrees that these can be scoped out of further specific consideration in the cumulative effects assessment.</i> <p>Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049], focuses exclusively on the Scheme's consumption and use of primary aggregates, as these are expected to constitute the majority of the materials needed to deliver the Scheme. This focus is also deemed appropriate due to the prominence given to aggregates in the DMRB LA 110 significance category descriptions.</p> <p>The ancillary discussion provided in Paragraphs 10.10.37 to 10.10.40 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] concludes that the 'Scheme is likely to result in a negligible uplift to regional and sub-regional sales of primary aggregates. It is therefore considered unlikely that the construction of the Scheme would, in isolation, create a scenario where there is a consequential increase in annual baseline sales of primary aggregate materials beyond 'business as usual'.</p> <p>As for whether the worst-case material requirements have been considered in the assessment, paragraphs 10.5.5 and 10.5.8 of Chapter 10: Material Assets and Waste, of the Environmental Statement [APP-049] state that:</p> <ul style="list-style-type: none"> <i>'This assessment has been undertaken on the basis of published minerals and waste information for the 2020 and 2021 calendar years. These data will have been influenced by reduced economic activity during the COVID-19 pandemic (i.e. with a corresponding reduction in aggregates sales and waste production).'</i> <i>'The ancillary discussions, presented in Section 10.10 of this chapter, therefore present a worst case as they are based on comparing the influence of the Scheme, in terms of its comparative materials consumption and waste generation, against a reporting year which is likely to have witnessed a corresponding reduction in aggregates sales and waste production'.</i> <i>'The quantities of material assets and waste predicted for the Scheme and used in this assessment comprise preliminary estimates consistent with the preliminary design information. Given that the estimated material required, and waste generated, may change between this assessment and eventual construction, a 15% uplift has been applied to all quantities'.</i>
50	Provide examples of how the use of the term 'significant' would work in practice in relation to future changes to the Scheme. Clarify whether the Applicant considers any changes could be significant.	Applicant	D4	<p>The Applicant does not intend to make any changes to the Scheme that could be categorised as significant. For clarity, the use of the term 'significant' in the draft Development Consent Order (dDCO) operates to restrict changes that result in a significant adverse effect which has not been assessed in the supporting Environmental Statement and would require mitigation which is not secured as part of the consent for the Scheme.</p> <p>As an example, Requirement 3 (Detailed Design) in the dDCO [REP3-006] requires the authorised development to adhere to the submitted preliminary design <i>unless</i> the Secretary of State agrees to changes after having first consulted with the relevant planning or highway authority. The Secretary of State is unable to approve any departures from the preliminary design that would result in "materially new or materially different significant adverse effects in comparison with those reported in the environmental statement" (the "Wording").</p>


Action	Description	Action by	When	Applicant Response & Summary of Action taken
				<p>Advances in technology and materials are constantly evolving and it is possible that before construction of the Scheme commences, a new material may become available to the Applicant that, if used in place of a material identified for use in the preliminary design, would have a beneficial effect on impacts reported in the ES. In this scenario, the Wording would not prevent the Secretary of State from approving the Applicant to use the new material during construction of the Scheme.</p> <p>Conversely, in a hypothetical scenario where a material identified in the preliminary design was subsequently identified as having a safety issue and the Applicant proposed to replace that material with an alternative that generated a significant adverse effect and required unsecured mitigation, the Secretary of State would be unable to approve the Applicant's use of that alternative material. This is logical because in this hypothetical scenario, the Secretary of State has not previously been provided with information regarding the impact of using the alternative material nor the possible mitigation in order to allow the Secretary of State to determine whether the use of the alternative material should be permitted. In that scenario the Applicant would have to formally apply for the proposed change which would allow the impact of using the alternative material to be assessed and any necessary additional mitigation required to be understood before a determination was made</p>
51	Consider if a more precise restriction for limits of deviation for the proposed attenuation ponds needs to be added to the dDCO.	Applicant	D5	
52	Provide more detail to explain why Article 45(3) is required and clarify whether any other made DCO has included a similar provision to Article 45(3).	Applicant	D5	
53	Consider whether reference to 'hard landscaping' should be included in Requirement 5(3).	Applicant and BMBC	D4	The Applicant confirms that Requirement 5(3) will be updated to refer to hard landscaping in the updated draft Development Consent Order submitted at Deadline 5 of the Examination.

Annex C: The Road to Good Design, Highways England (2018)



The road to good design



A wide-angle landscape photograph showing a multi-lane road bridge crossing a large reservoir. The bridge is a concrete structure with a road surface, and several cars are visible on it. The surrounding landscape consists of rolling hills with green and yellowish-brown vegetation, suggesting a rural or semi-rural setting. The sky is filled with large, grey clouds, creating a dramatic atmosphere. The overall scene is a blend of natural beauty and infrastructure.

inclusive
safe and useful restrained
innovative fits in context
long-lasting understandable
thorough collaborative
environmentally sustainable

Our vision

We aim to put people at the heart of our work by designing an inclusive, resilient and sustainable road network; appreciated for its usefulness but also its elegance, reflecting in its design the beauty of the natural, built and historic environment through which it passes, and enhancing it where possible.

Content

Foreword	7
Introduction	8
Connecting England	10
Connecting people	12
Connecting places	14
Connecting processes	16
Strategic Design Panel	20

10

Principles of good road design

Good road design:

- 1 makes roads safe and useful
- 2 is inclusive
- 3 makes roads understandable
- 4 fits in context
- 5 is restrained
- 6 is environmentally sustainable
- 7 is thorough
- 8 is innovative
- 9 is collaborative
- 10 is long-lasting

Foreword



As we deliver the biggest investment in our strategic road network in a generation we have been challenged to ensure that, as well as being safe, efficient and affordable, our roads are also beautiful. This aspiration, which I share, will deliver roads which not only serve a purpose but are also each examples of excellence.

To achieve this will require a shift in design culture within both Highways England and the wider roads sector. Fortunately we have the support of the Strategic Design Panel, whose work in shaping our vision and principles of good road design is invaluable. Panel members are drawn from a wide range of organisations; all committed to helping us achieve our goal.

The defined principles will help us place good design at the heart of everything we do, and ensure our roads better serve the people who use them and the environments through which they pass. And we will embed them for the future, ensuring a design-led approach becomes central to the requirements and advice contained in the Design Manual for Roads and Bridges.

I have great confidence that in meeting our challenge we will deliver safer, better, beautiful roads which connect people and connect our country. Because we believe a connected country is better for everyone.

Mike Wilson

Chief Highways Engineer and
Chair of Strategic Design Panel

Introduction

The purpose of this document is to challenge thinking about the design and quality of our roads.

Every day countless decisions are made regarding the strategic road network. These all have the potential to enhance or erode the distinctive character of a location, and our experience of driving through it. They could relate to the direction of a major road project, or a smaller, minor improvement or piece of maintenance; all can change a place for better or worse.

For many technical decisions are also design decisions and affect the quality and appearance of the network. By focussing on good design, Highways England can make a difference to the experience of road users and the communities through which our roads pass. Good design is a powerful tool for achieving a higher quality of life, as well as greater economic vitality and a more efficient use of resources.

We need to design in a way that is sensitive to the context of a road's surroundings and

responsive to the needs of those who use it and the communities through which it passes; this will create a vital piece of infrastructure that is not only functional, but also makes a positive contribution.

To support our vision for the network, we have established a set of principles for good road design which follow the themes of people, places and processes. These will encourage better design and provide the basis for road schemes to be objectively reviewed. For close engagement with communities, careful assessment of context, robust decision making and collaborative working, are all vital if ongoing road investment is going to truly enhance our urban and rural environments.

By focussing on good design, Highways England can make a difference.

Connecting England

The road to good design connects people, places and processes to achieve better outcomes.

These themes encompass 10 principles of good road design and support our aspirations for a network that responds better to both people and places through improved design processes.

Connecting people

People are at the heart of our design work, making good roads safe and useful, inclusive and understandable. Good road design reflects users' needs, engages with communities and works intuitively for all.

Connecting places

Good road design demands a deep understanding and response to place, to create a quality aesthetic experience for the user and wider community. This is restrained and environmentally sustainable design, in fitting with the context.

Connecting processes

A successful outcome focussed on people and places requires good design processes. These are collaborative, thorough and innovative, generating long-lasting outcomes that are of benefit to users and the wider community.

10 design principles

Our 10 principles are based on universal ideas of good design. They are not instructions for how to design a road, but are prompts to improve design quality and outcomes.

Design generally combines utilitarian, technical and economic considerations with aspects of place and culture. Universal good design is thus a balance and coordination of aesthetic, functional and technological considerations.

Road design is more bound to place and function than other design fields, with specific demands of technical design and safety that must be met. Since aesthetic considerations must accept these demands, the potential for variation is more challenging, but still possible for many elements such as signs and lighting for example.

The aesthetics of road design is further distinguished as many of its qualities are dictated by place itself. Our view of the landscape, particularly rural, is generally conservative and this has helped preserve its beauty, but presents a specific additional challenge for road design to be place responsive.

The journey to safer, better, more beautiful roads starts here.

Connecting people

Good road design:

1 makes roads safe and useful

Safety is fundamental to good road design; it is integral to both the usefulness of its function and the confidence of road users and their well-being. Good design creates safe roads which support and link to other wider imperatives, both nationally and locally, and that are fundamentally useful, meeting users' need for mobility effectively.

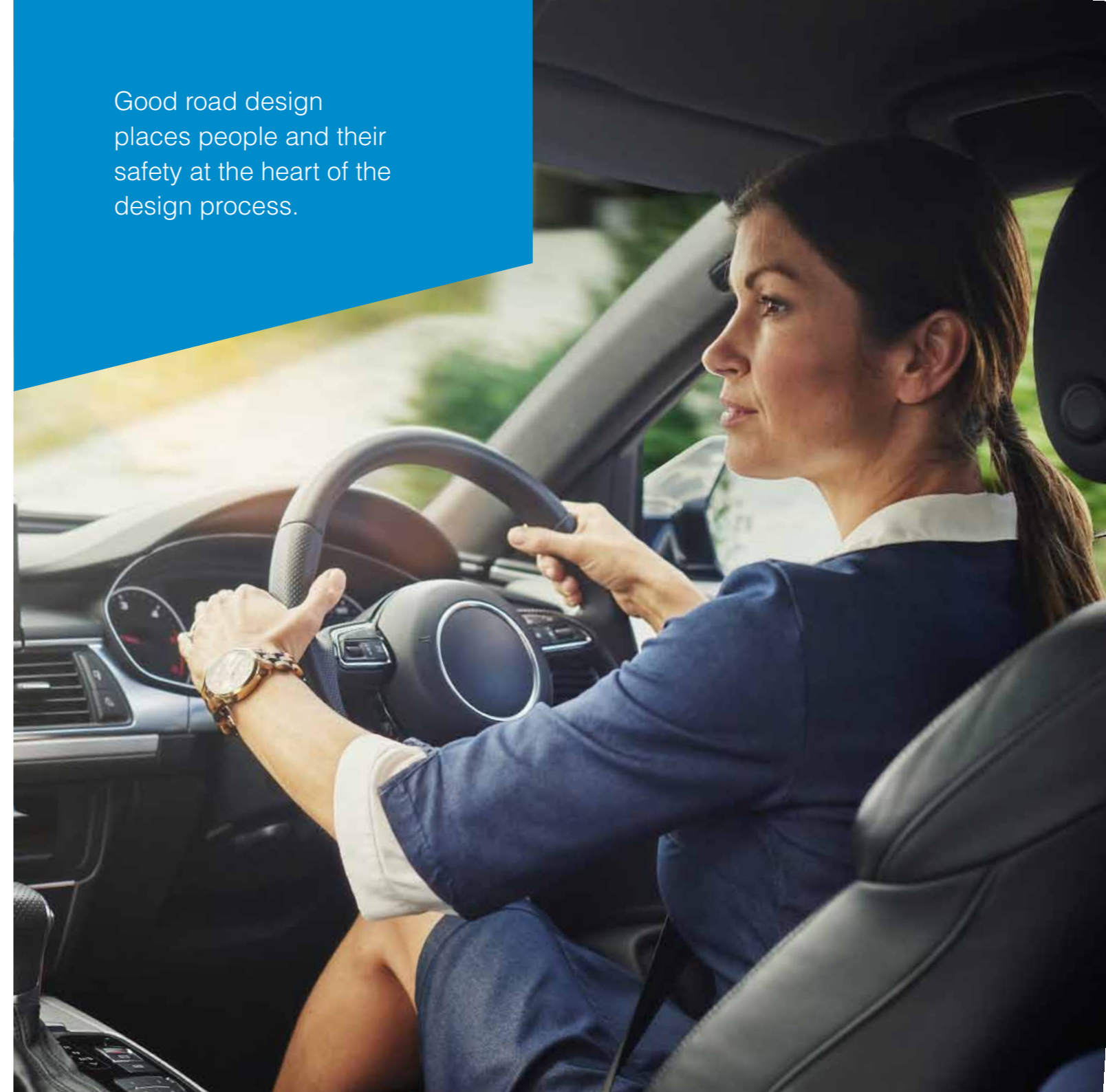
2 is inclusive

Inclusive environments facilitate dignified and equal use by all. An inter-disciplinary design process involves and places people's needs and views at its heart, nurturing well-being and creating a shared sense of ownership of the road. All users and communities are considered carefully in order to reduce barriers to access and participation, particularly mindful of the most vulnerable.

3 makes roads understandable

Easy to read, a good road is intuitive to use so as to be safe and efficient for all. 'Self-explaining roads' focus on the essentials and eliminate unnecessary and confusing clutter to make them legible, while responding to place and enhancing both environmental and economic outcomes.

Good road design places people and their safety at the heart of the design process.



Connecting places

Good road design:

4 fits in context

The aesthetic quality of a road and its design in relation to the places through which it passes, is integral to its function and the experience of those that use it. Good road design demonstrates sensitivity to the landscape, heritage and local community, seeking to enhance the place while being true to structural necessities. It builds a legacy for the future.

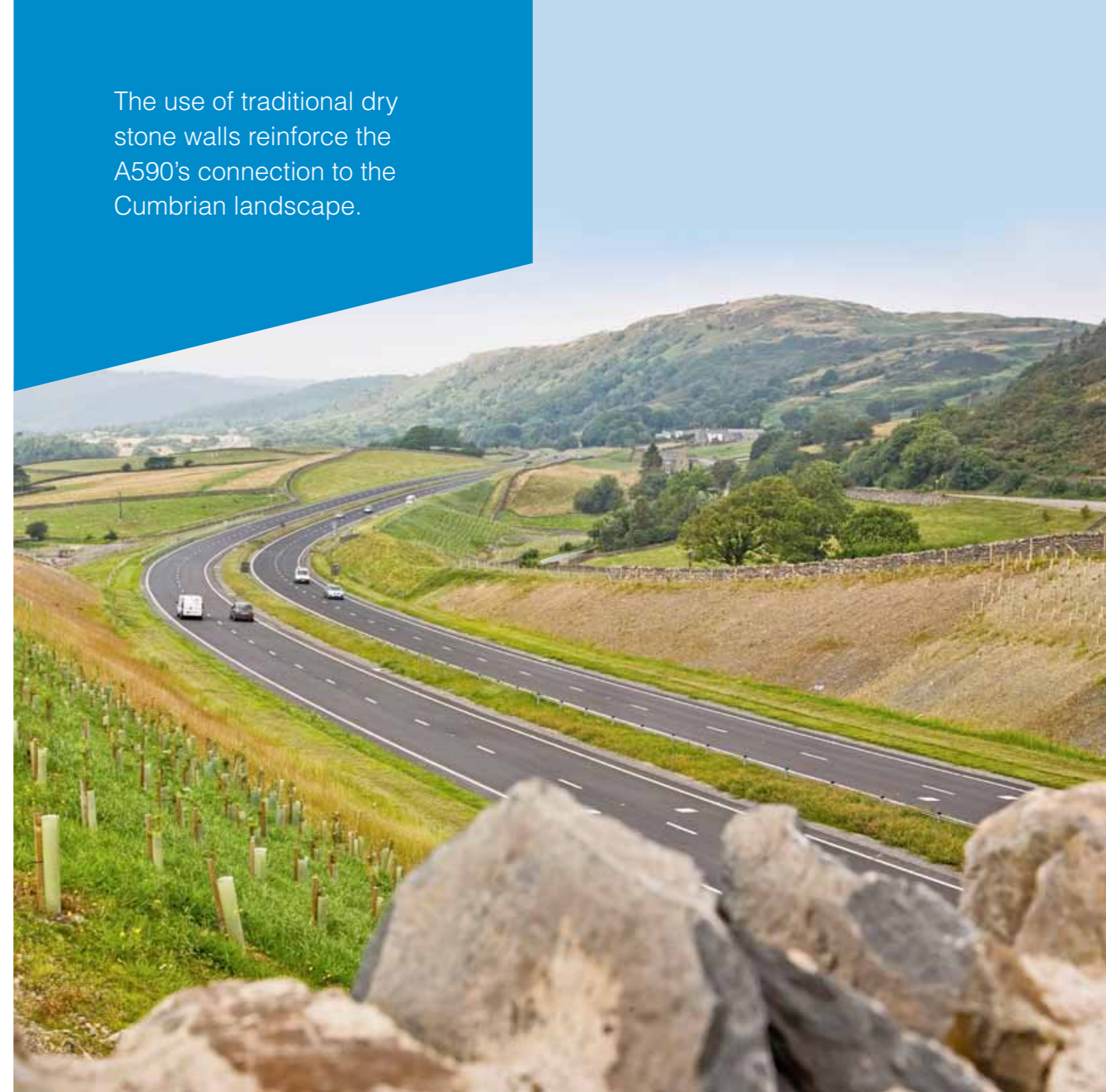
5 is restrained

Functional, but responding positively and elegantly to the context, good road design allows for the expression of the character and identity of the places and communities through which a road passes. Good road design can enhance a sense of place and add to what we have inherited, particularly through the use of appropriate materials and traditions, but does not make unnecessary superficial or superfluous visual statements.

6 is environmentally sustainable

Making an important contribution to the conservation and enhancement of the natural, built and historic environment, good road design seeks to achieve net environmental gain. It is multi-functional, resilient and sustainable, allowing for future adaptation and technical requirements, while minimising waste and the need for new materials.

The use of traditional dry stone walls reinforce the A590's connection to the Cumbrian landscape.



Connecting processes

Good road design:

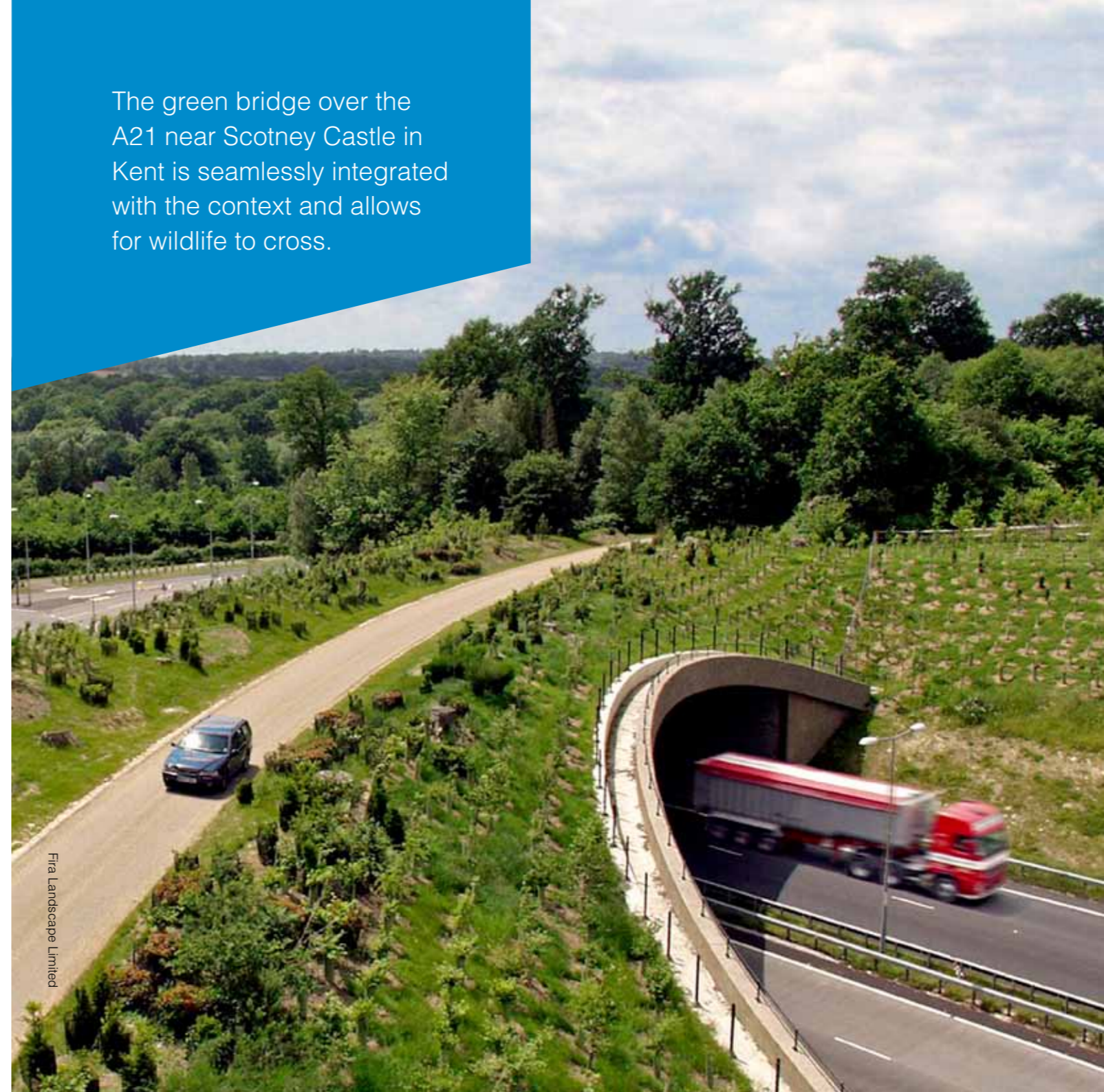
7 is thorough

The result of robust processes that create a continual cycle of improvement, good road design starts with an in-depth understanding of people, place and context; learning from best practice worldwide. The design of all elements of the road environment are considered together and integrated into a responsive design.

8 is innovative

Responding positively to change, good road design captures opportunities for betterment and develops in tandem with emerging new technologies. Designing to a standard is not the same as achieving good design; an innovative and resourceful approach that is mindful of context is necessary to achieve better outcomes.

The green bridge over the A21 near Scotney Castle in Kent is seamlessly integrated with the context and allows for wildlife to cross.



Connecting processes

Good road design:

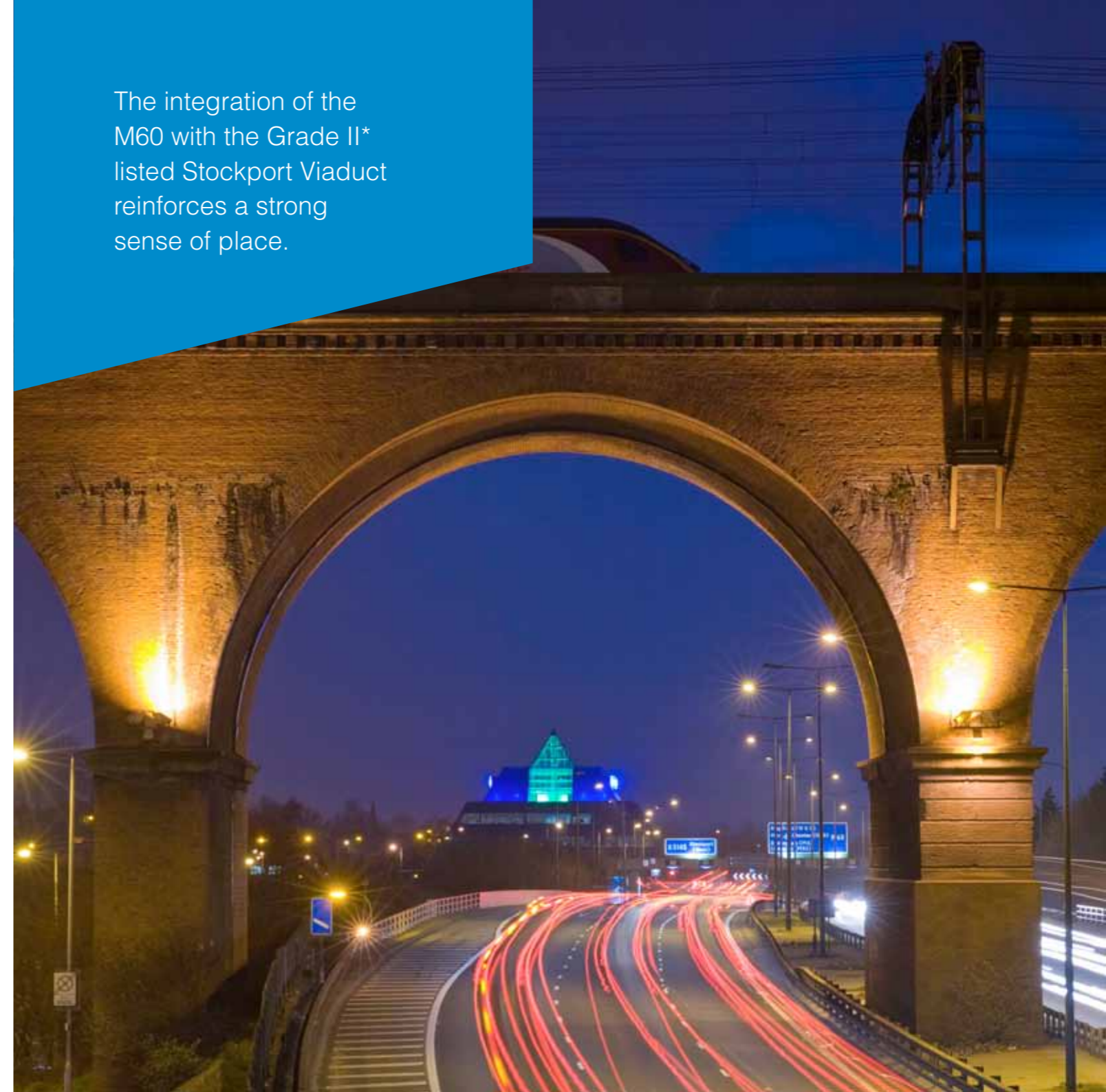
9 is collaborative

Collaboration ensures roads are useful to and accepted by the communities they serve. Collaborative working requires a rigorous process that identifies dependencies and wider opportunities, and facilitates effective communication and engagement from the start. Community engagement will be led by a local sense of culture, place and value.

10 is long-lasting

With quality materials and careful detailing, good road design brings lasting value. The design process requires sufficient time for challenges to be resolved before delivery and is adaptable to future needs and technologies as part of the commitment to whole-life operation, management and maintenance.

The integration of the M60 with the Grade II* listed Stockport Viaduct reinforces a strong sense of place.



Strategic Design Panel

The Highways England Strategic Design Panel is supporting the company to make a step change in the design quality of the strategic road network.

This change will see that design excellence in landscape, engineering and the built environment is at the heart of Highways England projects. The Panel seeks to ensure the strategic road network displays design quality through being safe, functional and effective, responding positively and sensitively to landscape character, cultural heritage and communities, while also conforming to the principles of sustainable development.

The work of the Panel takes place in the context of the government's wider road investments and its role is to independently advise Highways England on its approach to implementing projects and day to day operations. While the Panel does not have a statutory function in its own right, its advice and guidance can inform the statutory consent processes.

Highways England seeks advice from the Panel:

- to embed a context led approach into the development of the network
- on the design of road improvements, network management and operations
- on the development of relevant design standards and processes
- as required by the Secretary of State

The Panel takes an integral multi-disciplinary approach that sees design as a way to add value to projects by maximising opportunities and not simply as a mitigation tool. It publishes an annual progress report on its work and oversees the independent design review of individual Highways England projects.

Strategic Design Panel members:

Campaign for Better Transport
Design Council
Transport Focus
Chartered Institute of Highways and Transportation
Institution of Civil Engineers
Landscape Institute
Historic England
The Prince's Foundation
Institution of Structural Engineers
Royal Institute of British Architects
Campaign to Protect Rural England
Natural England
National Trust



inclusive
safe and useful restrained
innovative fits in context
environmentally sustainable
collaborative
understandable
long-lasting
thorough

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.

© Crown copyright 2018.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence: visit www.nationalarchives.gov.uk/doc/open-government-licence/ write to the **Information Policy Team, The National Archives, Kew, London TW9 4DU**, or email psi@nationalarchives.gsi.gov.uk.

This document is also available on our website at www.gov.uk/highways

If you have any enquiries about this publication email info@highwaysengland.co.uk or call **0300 123 5000***. Please quote the Highways England publications code **PR148/17**

Highways England Creative job number BED17 0048

*Calls to 03 numbers cost no more than a national rate call to an 01 or 02 number and must count towards any inclusive minutes in the same way as 01 and 02 calls.

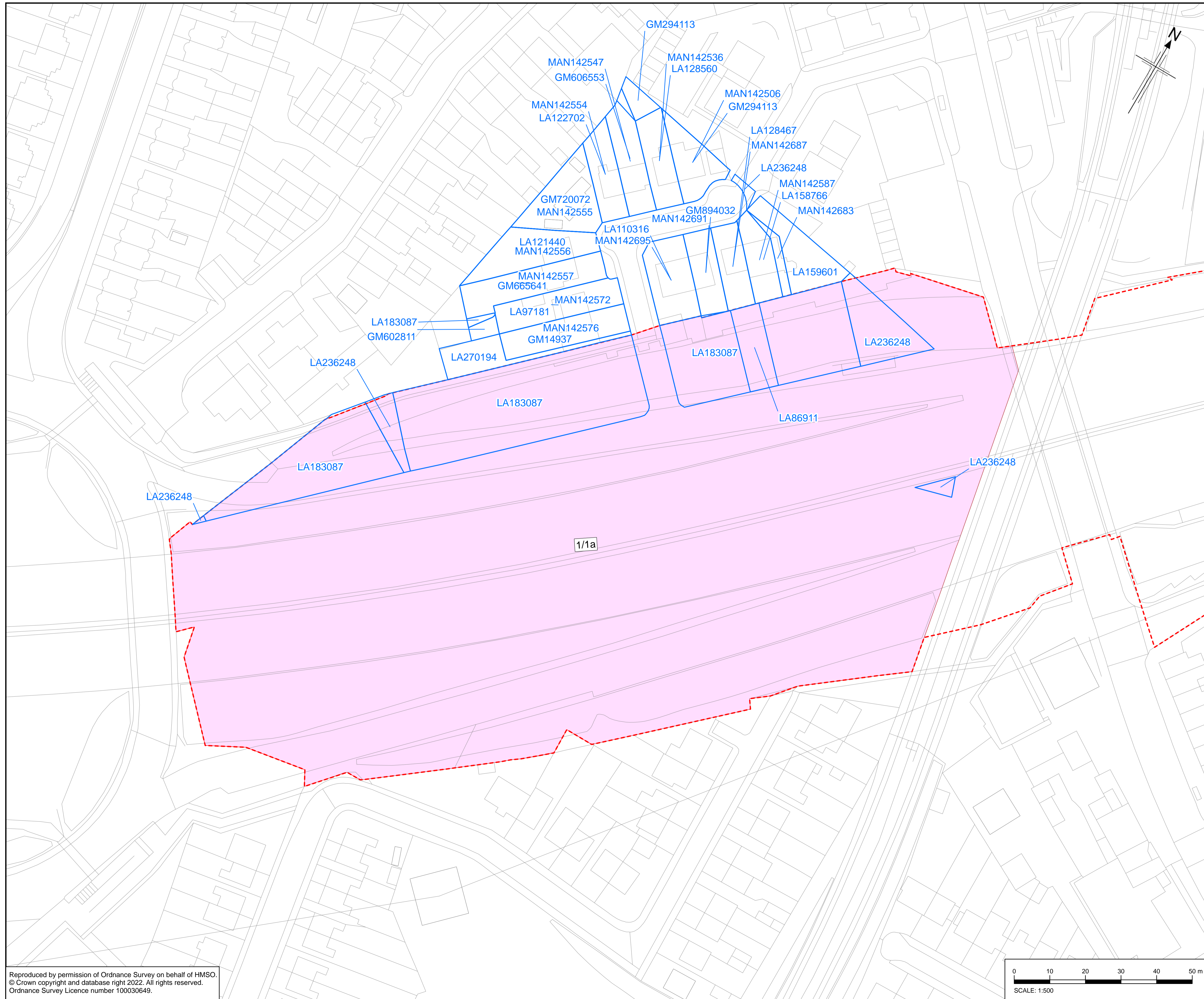
These rules apply to calls from any type of line including mobile, BT, other fixed line or payphone. Calls may be recorded or monitored.

Printed on paper from well-managed forests and other controlled sources.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

Highways England Company Limited registered in England and Wales number 09346363

Annex D: Individual Land Plan for Plot 1/1a



Notes

1. All dimensions, chainages, levels and co-ordinates are in metres unless stated otherwise.
2. This drawing is to be read in conjunction with all other relevant documentation.
3. The Land Plan plot numbers are described in the Development Consent Order Book of Reference (Document reference: TR010064/APP/4.3).

Key

- The Order Limits
- Land to be permanently acquired
- HMLR Title Boundary

Rev	Rev. Date	Purpose of revision	Drawn	Checked	Rev'd	Appr'd
P01	04/11/2024	FIRST ISSUE	NH	JW	AP	AP
Development Consent Order Number			Development Consent Order Drawing Number			
TR010064			TR010064/APP/2.3			



Project
M60/M62/M66 SIMISTER ISLAND INTERCHANGE

Drawing title
INDIVIDUAL LAND PLOT PLAN
1/1a

Regulation	5(2)(i)	
Purpose of issue	DEADLINE 3	
State Code	PRELIMINARY	
Project Stage	PCF STAGE 4	Drawing Status
Scale at A1 (841 x 594)	AS SHOWN@A1	S4
Ardent No.	000053	Rev
Client No.	HE548642	P01

Drawing number: HE548642 - ARD - LDC - SII_MLT
 Originator: ARD
 Volume: -DR- Z -0000

Reproduced by permission of Ordnance Survey on behalf of HMSO.
 © Crown copyright and database right 2022. All rights reserved.
 Ordnance Survey Licence number 100030649.

