

House of Commons

High Speed Rail (Crewe - Manchester) Bill

1. Petitioner information

In the box below, give the name and address of each individual, business or organisation submitting the petition.

Trafford Council
Talbot Road
Stretford
M32 0TH
Care of BDB Pitmans, Parliamentary Agents, One Bartholomew Close EC1A 7BL

In the box below, give a description of the petitioners. For example, “We are the owners/tenants of the addresses above”; “My company has offices at the address above”; “Our organisation represents the interests of...”; “We are the parish council of...”.

- 1.1.0 The Petitioner is Trafford Borough Council (“TC”), the Local Authority for the Borough of Trafford in Greater Manchester.
- 1.1.1 TC is a local planning authority and is, therefore, responsible for general planning and preparation of local plans. It is also the local highway authority and the education authority and has other powers and duties in relation to activities of public concern including housing, public health, recreation, civic welfare and amenity and the economic wellbeing of the area. As such, TC is responsible for the protection of its property, rights, security and interests and those of the citizens, inhabitants and ratepayers of Trafford as a whole.
- 1.1.2 TC also owns or has an interest in land that is subject to compulsory acquisition or use under the Bill.
- 1.1.3 TC and its rights, interests and property are injuriously affected by the Bill, to which TC objects for the reasons amongst others, hereinafter appearing.

2. Objections to the Bill

In the box below, write your objections to the Bill and why your property or other interests are **directly and specially affected**. Please number each paragraph.

Only objections outlined in this petition can be presented when giving evidence to the Committee. You will not be entitled to be heard by the Committee on new matters not included in your written petition.

2	Introduction and Summary
2.1	Introduction
2.1.1	TC is supportive, in principle, of the proposals to construct a new high speed railway between Crewe and Manchester (the “Proposed Scheme”). TC believes that the Proposed Scheme, if properly designed and efficiently implemented, will help to address the challenges facing the UK and provide improved rail capacity and connectivity with Trafford, Manchester Airport and the City of Manchester which will offer a catalyst for economic growth and regeneration.
2.1.2	However, TC is concerned that the proposals contained within the Bill fail to provide an integrated transport solution, fail to properly take into consideration planned transport schemes, including extensions to Metrolink and the proposed Northern Powerhouse Rail (NPR) and fail to provide appropriate mitigation measures to reduce the significant impacts on local communities, businesses and the public transport network. These failures reduce the overall benefits of the Proposed Scheme and do not meet HS2’s core objective to “ <i>Support development and regeneration across the North-West through the alignment to and support of local authority growth strategies, enabling the development and transformation of key sites at Manchester Piccadilly and Manchester Airport</i> ” (HS2 Phase 2b Western Leg: Crewe to Manchester Update to the Strategic Outline Business Case (SOBC), p30. The misalignment between the Bill proposals and developed local policy aims and Greater Manchester’s (GM) long-term strategic ambitions need to be addressed.
2.1.3	TC is further concerned about the significant impacts the Bill, as written, will have on the businesses, communities and the environment in Trafford, which it considers will reduce the overall benefits of the Proposed Scheme, and has concerns on the travel, cycling and walking experience, and the overall quality of life, of those living, working and visiting Trafford.
2.1.4	TC is also concerned about the impact of the current proposals within the Bill on the regeneration plans within Trafford and GM, which could reduce the jobs and economic growth benefits of the Proposed Scheme and wider development proposals. This is against the submitted Places for Everyone (PfE) joint Local Plan, approved Strategic Regeneration Frameworks (SRFs) and associated masterplans, and also the Proposed Scheme’s own strategic goal (as stated in the High-Speed 2 Phase 2 Strategic Case) to act as a catalyst for sustained and balanced economic growth across the UK.

- 2.1.5 TC is therefore unable to fully support the Bill in its current form and objects to the Bill for the reasons, amongst others, stated in this petition.
- 2.1.6 In advancing its concerns, TC invites the House and the Committee to which this petition is referred, to consider the basis for, and implications of, any argument by the Promoter that amendments, assurances or other improvements and safeguards must involve no or minimal extra cost to the Promoter. Otherwise, it will not be possible to achieve the objective to “*deliver value to the UK taxpayer and passenger*” (High-Speed 2 Phase 2 Strategic Case).
- 2.1.7 In TC's view:
- a) Cost to the Promoter ought to be balanced against the cost to the community and regional and national economic interest and the public interest more generally.
 - b) Integral to any cost equation is the lost opportunity cost of not making provision now, particularly where this represents the one and only or best opportunity for doing something and failure to take that opportunity means accepting a sub-standard solution and losing the potential to generate very significant community and economic benefits – the latter including those captured through taxation of the subsequent development and business growth.
- 2.1.8 TC supports the petitions of Transport for Greater Manchester (TfGM), the Greater Manchester Combined Authority (GMCA), other GM Local Authorities (including Manchester, Wigan and Tameside Councils) and Manchester Airports Group (MAG) in relation to the potential impacts of the Proposed Scheme as a result of the construction and operation of the proposed Airport Station and high speed railway line from the Airport Station to the proposed station at Manchester Piccadilly.
- 2.1.9 TC remains hopeful that a large number of its concerns will be met by agreement with the Promoter, but is concerned that no binding commitments have yet been agreed with the Promoter to address TC's concerns, with many of the details that are needed to inform such an agreement not having yet been supplied by the Promoter.
- 2.1.10 Furthermore, TC considers that the Environmental Statement (ES) which accompanied the Bill is deficient for the reasons set out in its response to the ES consultation. That response should be read alongside and be considered to form part of this petition. The deficiencies within the ES mean that the descriptions of the Proposed Scheme's likely significant adverse environmental effects and the appropriateness of proposed mitigation measures cannot be relied on.
- 2.1.11 The lack of appropriate mitigation measures will lead to significant adverse effects on the environment, local communities, businesses and the public transport network.
- 2.1.12 Moreover, TC is further concerned that the Promoter seeks to rely on its proposed “Environmental Minimum Requirements” (EMRs) in lieu of specific mitigation proposals. TC has discussed the effectiveness of the EMRs with the host authorities for Phase 1 and 2a. As a result, TC has limited confidence that

the EMRs can be relied on to effectively mitigate the impacts of the Proposed Scheme.

2.1.13 Consequently, TCs' principal concerns with the Bill are:

- a) The design of the proposed high speed station in the vicinity of Manchester Airport (the Airport Station) and integration into the future urban area of the proposed Places for Everyone (PfE) Timperley Wedge development, particularly the challenges relating to the changing ground levels to the west of the station.
- b) The landscape and visual impact of the Airport Station – particularly regarding shallow vs deep cutting options.
- c) An inappropriate design for highways access to the Airport Station at Junction 6 of the M56, which does not take into account future demand from NPR services, planned development, Airport growth or encourage active travel.
- d) An inappropriate highway only design solution for the Hale Road gyratory and associated lack of adequate provision for non-motorised users.
- e) The likely significant adverse effects of the construction traffic of the Proposed Scheme on the local and strategic highway network.
- f) Inadequate provision for the remediation and long-term maintenance arrangements in relation to the local and strategic highway network.
- g) Proposals in relation to local funding contributions for the Airport Station.
- h) Inadequate integration of, and powers for, Metrolink at the proposed Airport Station.
- i) The need for the Proposed Scheme to be designed as sustainably and energy efficiently as possible, both during construction and operation in order to limit carbon emissions and increase the use of renewable energy.
- j) The need for additional mitigation measures for residents and businesses in relation to the likely significant sound, noise, vibration and air quality effects arising from the construction and operational phases of the Proposed Scheme.
- k) The lack of consideration for alternative spoil and materials movement methods such as use of a conveyor / railhead system or a haul route at the site of the proposed Airport Station.
- l) The need for sufficient additional resources for TC to manage the construction and operational impacts of the Proposed Scheme.
- m) The need for additional, advanced and mature planting and landscape mitigation measures to minimise impacts of the Proposed Scheme, allowing sufficient establishment of vegetation and habitats prior to construction and/or operation taking place.

2.1.14 Rather than complete section 3 of the petition template, TC has listed its requests in this section under each issue.

2.2 Policy Context

- 2.2.1 TC's concerns should be seen in the context of both national policies to promote levelling up, decarbonisation and clean air and the HS2 Phase 2b SOBC, as well as TC's and GM's strategic initiatives and policies to maximise sustainable and inclusive economic growth and environmental change, which TC has shared with the Promoter over a number of years.
- 2.2.2 The Proposed Scheme must be designed and delivered in line with national and local strategies and policies in order to realise regeneration opportunities, and provide the right scheme for users and the future. Key local policies include (but are not limited to) the following:
- a) **GM HS2 & NPR Growth Strategy; 'The Stops Are Just the Start' (2018)** - sets out how the Proposed Scheme can have maximum impact through station planning; wider connectivity; full support for committed and new economic and residential growth and regeneration; and local skills and supply chain benefits.
 - b) **The Greater Manchester Transport Strategy 2040** - includes the "Right Mix" ambition for at least 50% of all journeys to be made by active travel and public transport by 2040 and details of the GM Mayor's 'Our Network' plan to create an integrated, modern and accessible transport network.
 - c) **City Centre Transport Strategy to 2040** - sets out an integrated package of measures to support more sustainable transport options when travelling to, from and within the city centre, taking account of the city centre's continuing economic and population growth, and Manchester's ambition to become a zero-carbon city, by 2038. The strategy sets an ambitious goal for 90% of all trips to the city centre to be non-car modes by 2040 in the morning peak.
 - d) **GM Clean Air Plan** - GM has published a case for a new Greater Manchester Clean Air Plan, which was submitted to government on 1 July 2022. It sets out evidence supporting an investment-led approach, to address the city-region's air pollution problem.
 - e) **Places for Everyone (PfE)** – the long-term joint Local Plan for nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. This strategic framework sets out a plan to manage growth so that Greater Manchester is a better place to live, work and visit by (among other things): 1) providing the right homes, in the right places, for people across the city-region; and 2) creating jobs and improving infrastructure to ensure the future prosperity of Greater Manchester.
 - f) **Trafford's Local Plan** – TC is currently in the process of updating its local plan. The draft Local Plan will cover the period up to 2037, and has been prepared in the context of PfE. It reflects the spatial strategy and strategic policy framework set out in PfE, which includes a number of strategic allocations which are proposed to be removed from existing Green Belt and/or safeguarded for future development due to the significant benefits that the Proposed Scheme will bring to Trafford.
 - g) **Our Trafford, Our Future 2021-24** - The corporate plan describes TC's strategic vision, outcome and priorities for the borough, with the priorities being key to its delivery. The plan's focus is the delivery of the following three

priorities: 1) Reducing health inequalities; 2) Supporting people out of poverty; and 3) Addressing our climate crisis.

- h) **Carbon Neutral Action Plan (December 2020)** - TC declared a Climate Emergency in November 2018. Since then, a Carbon Neutral Action Plan has been developed which sets out a wide-ranging series of actions which combined, will help TC achieve its target of achieving carbon neutrality in the borough by 2038.

3 Proposed Manchester Airport High-Speed Station Design

3.1.1 TC supports the construction of the proposed Airport Station in principle. The station offers a once in a generation opportunity to deliver a high quality, multi-modal transport hub, which will offer long-term employment opportunities and help facilitate greater usage of public transport.

3.1.2 However, TC has a number of concerns about the proposals for the Airport Station included in the Bill. In particular, TC does not believe that the current design supports a fully integrated station, which is in line with the GM HS2 and NPR Growth Strategy and can maximise the growth potential of the area surrounding the airport and considers that the current proposals could be improved in several areas to maximise its potential benefits, whilst ensuring more suitable integration with the surrounding area.

3.1.3 The Airport Station will be close to existing residential areas on Brooks Drive, Davenport Green, Shay Lane and the wider Hale Barns area. The substantial height of the proposed structure(s) will be very visible across a wide area and will have a range of detrimental impacts during both construction and operation. Davenport Green Ancient Woodland will be significantly reduced in size by the proposals, and the surrounding highway network, including the M56, will also be severely impacted.

3.1.4 The significant construction time-period and raised height of the Airport Station and associated infrastructure during operation mean that it has the potential to become a dominant and overbearing feature of the wider local landscape.

3.1.5 An improved range of mitigation measures and design of key elements of the Airport Station are therefore fundamental to reduce its potential long-term adverse impacts.

3.2 DfT Requests for Local Funding Contribution for the Airport Station

3.2.1 The Promoter has stated that it expects a local funding contribution to a number of the Bill proposals, for example the Airport Station. However, the Promoter has not endeavoured to reach agreement with TC on the scope of the proposals being put forward, whether they are an integral part of Phase 2b or otherwise. In the case of the Airport Station, this is manifestly an integral part of the Proposed Scheme and the business case, but it is the only new station anywhere on the High Speed network where there is an expectation of the station itself having a significant local funding contribution.

3.2.2 Where local partner funding is agreed with the Promoter for any works, local partners should be a co-client and therefore be party to the development of scope, delivery mechanisms, and cost management of those works. This joint approach has not been the case to date.

3.2.3 Given this expectation of local funding, TC also has significant concerns regarding the costs of these works, the process by which the costs have been developed and the cost control measures in place, particularly in light of the escalating costs on Phase 1 of the High Speed network. To assist in reaching any potential agreement on funding, the scope of the proposals needs to be appropriate and align with local policy, with full visibility of costs and cost management.

Request:

3.2.4 TC requests that the Promoter be required to give an undertaking to agree with TC the design, scope and delivery of any aspects of the proposals which are to be locally funded by TC, and if necessary, amend the Bill to enable the agreed scope to be delivered. As part of this undertaking, the Promoter should be required to provide full visibility of costs and undertake to agree cost savings and cost management processes with TC.

3.3 Airport Station Design and Public Realm

3.3.1 TC contends that the planning regime in the Bill does not provide adequate controls to ensure that the Airport Station, associated structures and surrounding public realm is delivered to the highest architectural and design quality and accessibility design standards, required for a major gateway station, adjacent to an area of significant planned growth and development known as Timperley Wedge. In particular, there are no details in the Bill or ES to robustly demonstrate how the Proposed Scheme would maximise the planned regeneration and economic growth potential of Trafford.

3.3.2 TC considers it essential that full advantage is taken of the opportunity to maximise growth benefits for the Timperley Wedge area and the wider borough, city region and the UK. Fundamental to this is that the Airport Station is designed in a way that provides a gateway to Timperley Wedge and Manchester Airport, properly connected into the surrounding area, and fully integrated visually and with all transport modes. The Promoter does not set out proposals in the Bill or ES which satisfy TC in these regards.

3.3.3 Failure to address these issues in the design and implementation of the Proposed Scheme would result in significant harm by failing to create a well-designed place resulting in a sub-standard environment and arrival point for passengers, which is out of line with the national agenda of achieving well-designed places and building better, building beautiful. This would also lead to a failure to maximise the economic growth of levelling up, which are fundamental aims of the HS2 Phase 2b Business Case, PfE joint Local Plan (2021) and GM HS2 and NPR Growth Strategy. TC has set out its aspirations for regeneration in this area of Trafford within the submitted PfE joint Local Plan (2021).

Request:

3.3.4 TC requests that the Promoter be required to give an undertaking that:

- a) He will agree a mechanism and governance process with TC and other relevant stakeholders such as GMCA, TfGM and MAG, by which the Promoter, TC and other stakeholders can develop and agree an appropriate detailed design for the Airport Station and surrounding public realm, and to implement

the agreed design in full prior to the Airport Station commencing operational high-speed services;

- b) Prior to the above mechanism, he will agree with TC and other stakeholders all designs and implementation phasing before seeking formal submission of any Schedule 17 approvals related to the Airport Station and surrounding public realm which relate to any works at the Airport Station;
- c) He will take account of any locally adopted planning and/or design policies (such as Timperley Wedge PfE policy, SPD/Masterplan and/or Trafford design guides) when developing the detailed design for the Airport Station and other relevant infrastructure;
- d) He will construct:
 - (i) the Airport Station; and
 - (ii) a section of spine road required to deliver the Timperley Wedge development through the construction compound for the Proposed Scheme linking to Roaring Gate Lane from the realigned Thorley Lane, as early as reasonably practicable after Royal Assent is granted and share and agree the detailed timetable for their construction with TC, so as not to sterilise or delay the delivery of the Timperley Wedge development;
- e) He will produce and agree with TC, a mechanism and governance process by which the Promoter will produce delivery mechanisms for any development activity within the wider Timperley Wedge area, including land safeguarded for future development; and
- f) He will agree a mechanism and approach to calculating an appropriate increase to the provision of, and management strategy (which shall thereafter be fully implemented and maintained by the Promoter or his successors) in relation to, pedestrian infrastructure, bicycle, e-bike and e-cargo bike etc. parking spaces and charging facilities in the Airport Station during the detailed design phase, in order to ensure that the provision is adequate at the time of opening.

3.4 Scale of Multi-Storey Car Parks at the Airport Station

- 3.4.1 The Bill proposes the construction of two 5 storey car parks with provision for up to 3,782 car parking spaces.
- 3.4.2 The car parks are to be located either side of the high-speed railway line, located south-west and south-east of the central concourse. Although dimensions of these structures have not been provided, indicative drawings within the ES documents indicate that they will be significant in both height and length.
- 3.4.3 Such structures would appear wholly incongruous and result in significant visual impacts within the site and on the wider landscape, and significantly alter its character and appearance. This impact was identified as being major adverse (significant) in the ES.

Request:

- 3.4.4 TC requests that the Promoter be required to give an undertaking to:

- a) Work collaboratively with TC on the sustainable design of the multi-storey car parks to ensure that they are of a high-quality design and appearance, with minimal negative landscape and visual impacts; including taking account of the national design agenda, and any locally adopted planning and/or design policies (such as Timperley Wedge PFE policy, SPD/Masterplan and/or Trafford design guides); and
- b) Work collaboratively with TC to agree an appropriate mitigation scheme including planting and landscaping schemes for and in advance of the Airport Station and associated structures (including car parks). Such schemes should make provision for the inclusion of advanced and mature planting before and during the construction and phase of the Proposed Scheme and its subsequent operation.

3.5 Proposed height of the Airport Station and depth of cutting

3.5.1 The Airport Station is to be situated in a cutting. The ES Volume 5: Appendix CT-003-00000 Alternatives report (Ref: M97) sets out that three options for the vertical alignment of the Airport Station were considered, comprising:

- a) Option 1 - deep cut with HS2 Manchester spur under the M56 and platforms 11.5m below ground level at the deepest point;
- b) Option 2 - shallow cut with HS2 Manchester spur under the M56 and platforms 4.5m below ground level at the deepest point; and
- c) Option 3 - shallow cut with HS2 Manchester spur over the M56 and platforms 4.5m below ground level at the deepest point.

3.5.2 The 'shallow cut' / Option 2, which has been taken forward, was assessed within the report as resulting in greater noise impacts during operation compared to the 'deep cut' / Option 1 on residents along Brooks Drive and Davenport Green. In addition, during operation Option 2 was also considered to have greater landscape and visual impacts compared to Option 1.

3.5.3 TC has serious concerns regarding the proposed height of the shallow cut option proposed for the Airport Station's central concourse and associated roof / canopy structure (up to 228m in length). At 11 and 30 metres above existing ground level respectively, it is considered that these heights would result in significant long-term detrimental visual and noise impacts on local communities at Brooks Drive, Shay Lane, wider Hale Barns area and the wider landscape, during both construction of the Airport Station and operation of HS2 services.

3.5.4 The 'shallow cut' option for the Airport Station also causes substantial issues for the proposed Metrolink connection. The significant elevation from ground level to the station concourse would require a section of Metrolink viaduct 216m in length to be able to gain the necessary height of up to 15m above ground level for Metrolink services to access the proposed Metrolink stop (which would be elevated above the main Airport Station concourse), giving rise to further significant visual impacts.

3.5.5 This results in the Metrolink tram stop and approach viaducts being similarly raised to a significant height above existing ground level, leading to an increase in construction cost, embodied carbon, and environmental impacts.

3.5.6 Moreover, the raising of Metrolink as a result of pursuing the 'shallow cut' option has further exacerbated TC's existing concern that the north-facing Metrolink stop at the Airport Station will be exposed to the weather, without provision of any screening to protect passengers from the elements.

3.5.7 The 'shallow cut' option will also cause substantial urban integration challenges for the surrounding development parcels in the Timperley Wedge allocation, giving rise to the significant risk of the Airport Station area being dominated by monolithic transport structures which will restrict the development potential of the area and lead to significant place shaping challenges.

Request:

3.5.8 Amendments should be made to the Bill to lower the depth of the cutting for the Airport Station from 4.5m below ground level to 11.5m below ground level at its deepest point.

3.5.9 If the proposed amendments are not made to the Bill, TC requests that the Promoter be required to give an undertaking that a comprehensive landscape mitigation scheme, prepared by the Promoter, is submitted to, and agreed by TC to ensure that detrimental visual and/or noise impacts (among others) on local residents are minimised, through the use of advanced and mature planting and other suitable measures.

3.5.10 TC also requests that the Promoter be required to give an undertaking to provide sufficient financial compensation to cover the full cost of noise insulation improvements (or similar) required for residential properties and businesses at risk from significant noise impacts resulting from the construction and/or operation of the Airport Station, high-speed rail and/or high-speed services.

3.5.11 TC also requests that the Promoter be required to give an undertaking to agree a mechanism and governance process with TC and TfGM to determine the mitigation measures that are necessary to minimise the adverse impacts that would be caused and additional costs incurred by adoption of the 'shallow cut' in relation to Metrolink, such as an enhanced Metrolink viaduct and additional mature tree planting to form screening, and to fund these mitigations.

3.6 Sustainability of Airport Station

3.6.1 TC is concerned that in a warming climate and at a time of escalating fuel and energy costs and scarcity, the proposed Airport Station construction and design is not currently as sustainable and energy efficient as possible. Further, the design does not include the necessary infrastructure to future proof the Airport Station such as EV charging points for cars and cargo bikes etc. or the use of renewable sources of energy.

Request:

3.6.2 TC requests that the Promoter be required to give an undertaking to agree a mechanism and governance process with TC by which the Promoter and TC develop and agree an appropriate detailed design for the sustainability and

energy efficiency of the Airport Station, both during construction and operation, in order to limit carbon emissions and increase the use of renewable energy.

3.7 Retaining wall at Davenport Green Ancient Woodland

3.7.1 Construction of the Airport Station will result in the permanent loss of 1.7ha of Davenport Green Wood SBI, which equates to a 50% loss. 0.7ha of this loss would be ancient woodland habitat.

3.7.2 To reduce the need for a greater loss of the woodland, the Proposed Scheme incorporates a reinforced retaining wall up to 11m in height and 175m in length, to overcome the significant change in levels between the elevated position of the Airport Station concourse and the ground level of the adjacent woodland.

3.7.3 The height and scale of the retaining wall would result in a dominant and overbearing feature which could significantly alter the character and appearance of Davenport Green Ancient Woodland and the wider area. It would also have a detrimental impact on the area's existing biodiversity and would act as a major barrier to integration with the surrounding area and wider future development.

3.7.4 The need for the retaining wall to be so extensive is a direct result of the 'shallow cut' option for the station being taken forward.

Request:

3.7.5 Amendments should be made to the Bill to lower the depth of the cutting for the Airport Station from 4.5m below ground level to 11.5m below ground level at its deepest point.

3.7.6 TC also requests that the Promoter be required to give an undertaking that the Promoter will agree a mechanism and governance process with TC by which the Promoter and TC develop and agree an appropriate detailed design for the retaining wall and wider landscape.

4 Metrolink Western Leg

4.1.1 TC has significant concerns with Scheduled Work No. 2/16 of the Bill. TfGM has statutory powers, under the Greater Manchester (Light Rapid Transit System) (Airport Extension) Order 1997 (the "Airport Tram Order"), to construct, operate and maintain a Metrolink route to Manchester Airport, split into two legs – Western (from Roundthorn to Manchester Airport) and Eastern from Roundthorn to Manchester Airport via Wythenshawe Town Centre - opened in 2014). The Metrolink Western Leg from Roundthorn to Manchester Airport was deferred in anticipation of potential adjustments to its route to serve the Airport Station.

4.1.2 When complete, the Metrolink Western Leg would provide connectivity to and within the Airport area, including to the Timperley Wedge development and the Airport City Enterprise Zone. It is also a core component in a network of future services to this area using tram-train technology.

4.1.3 TfGM's existing statutory powers for the Metrolink Western Leg will not be capable of implementation if the Bill as promoted is enacted, as the Airport Station is located outside of the Airport Tram Order limits. As a result of the Bill

proposals, TfGM will be unable to provide public transport by way of a tram between the existing airport stop and the Airport Station or into the wider area.

- 4.1.4 In lieu of a Metrolink connection, the Bill proposes a shuttle bus service between the Airport Station and Manchester Airport. These shuttle buses will add congestion to an already congested highway network and are likely to be disrupted when further works are carried out to the local highway network for NPR, causing unnecessary disruption to local travellers and businesses. In addition, the use of a shuttle bus service between the Airport Station and Manchester Airport means that any journey time savings to be enjoyed by passengers using high-speed services will be lost when those same passengers suffer delays as they seek to connect to Manchester Airport.
- 4.1.5 The problems associated with shuttle buses described above are now belatedly being addressed at Luton Airport by the Direct Air-Rail Transit (DART) scheme opening this year. For the Promoter to impose the same problems at the Airport Station through inadequate Bill proposals, when there is a ready solution in the form of an amended Metrolink Western Leg, is totally unacceptable in the context of the government's Levelling Up agenda.
- 4.1.6 TC has further concerns with Scheduled Work No. 2/16 of the Bill, which omits the provision for a Metrolink junction to the immediate west of the tram stop at the Airport Station, allowing for a future tram-train route to the south-west. This tram-train proposal forms part of GM's HS2 NPR Growth Strategy wider connectivity initiative, aimed at ensuring the benefits of the Proposed Scheme are widely disseminated across GM and beyond.

Request:

- 4.1.7 TC requests that the Bill be amended to provide statutory powers, and that those powers be conferred on TfGM – including land acquisition powers – to construct, operate and maintain:
- a) A section of Metrolink Western Leg route in accordance with the current detailed technical information that TfGM has shared with the Promoter, which connects into TfGM's existing powers under the Airport Tram Order and thereby creates a Metrolink connection to the Airport Station; and
 - b) A Metrolink junction to the immediate west of the proposed tram stop in accordance with the current detailed technical information that TfGM has shared enabling a future Metrolink route to the south-west.
- 4.1.8 TC also requests that the Promoter be required to give an undertaking that they will agree with TfGM an integrated delivery strategy that will enable Metrolink to be delivered into service as early as is practicable, and certainly from day one of high speed operations. This integrated delivery strategy shall ensure that the necessary worksites and access for Metrolink construction are provided in a timely manner.

5 Inappropriate Airport Station access design causing unacceptable impacts on Local and Strategic Road Networks

- 5.1.1 TC has a number of concerns about the proposals for access to the Airport Station included in the Bill which will cause significant harm to local road and public transport users, residents, businesses (including Manchester Airport), Airport passengers and the local environment.

- 5.1.2 The Bill proposals envisage over 95% of passengers accessing the Airport Station via road, which will result in “significant adverse residual traffic effects” on road users at 21 junctions, on non-motorised users along 37 roads, and on 7 bus services. The Bill proposals offer no location specific interventions to mitigate these impacts. TC finds this unacceptable.
- 5.1.3 This is further compounded by limited provision for active travel (including a lack of cycling facilities in the Airport area and a design that will increase journey time for active travel users), a failure to consider bus facilities within the Airport area and a failure to provide a connection to Metrolink as referred to above.
- 5.1.4 The highway proposals in the Bill do not consider the current levels of congestion and instead exhaust resilience on the road network which TC, TfGM, other GM Authorities and National Highways have worked hard to safeguard. The M56 between junctions 3 and 8 is linked to several arterial trunk roads and is a critical part of the strategic road network carrying more than 100,000 vehicles per day and plays a vital role in terms of Airport access for passengers, cargo, staff and service traffic and access to the Airport environs. The highway modifications proposed in the Bill to M56 Junction 6, and its connecting roads, will result in that junction and surrounding junctions operating over capacity, resulting in significant residual adverse traffic effects in the form of congestion worsening and further unreliability.
- 5.1.5 TC is concerned that the proposed modifications to the road network associated with the Airport Station will also be inadequate to support growth and planned development in the Airport area offering a future proofed design. Greater Manchester’s PfE identifies the Airport area as a Strategic Location for significant employment and residential development. The PfE has been submitted to Government for examination and is due to be adopted in 2023, ahead of Royal Assent being granted for the Bill, yet the developments in PfE have not sufficiently been taken into account in the Bill proposals.
- 5.1.6 Further, whilst the Airport Station is designed to cater for NPR passengers, the impact of those additional passengers on the road network is not addressed. Instead, it is expected that the highway network will be modified post the Proposed Scheme’s construction to accommodate NPR, which will significantly extend the duration for which residents, businesses and employment sites in the Airport area would be subject to adverse social, economic and environmental construction related impacts.
- 5.1.7 The Bill proposals also rely on road infrastructure that will not be in place when construction commences. The Bill proposals assume that Runger Lane would be a dual carriageway and that full signalisation of both sides of M56 J6 (the Rainbow Works) would have been delivered ahead of the Proposed Scheme. These assumptions are incorrect.
- 5.1.8 The Rainbow Works are currently not committed developments, but form part of a planning condition placed on Manchester Airport, capping the number of passengers at a certain level until the Rainbow Works are in place. Due to the downturn in aviation caused by the COVID-19 pandemic, MAG do not expect the trigger level for the Rainbow Works to be reached in time to enable its delivery before 2025. In its current form, Runger Lane is already congested, and the Promoter’s proposed use of it will only exacerbate that congestion.

	<p>This reliance on road infrastructure that will not be in place renders the Proposed Scheme's design inadequate.</p>
5.1.9	<p>Furthermore, the Transport Assessment in the ES did not consider the effects of weaving, merging and diverging traffic on the M56 as a result of the Proposed Scheme. Due to the dense nature of the motorway network and junctions linking it to the local road network, this is a significant factor in the operational performance of all roads in the area, not just the motorway.</p>
5.1.10	<p>The Proposed M56 junction 6 design to access the Airport Station involves the use of a gyratory which results in longer journey lengths and times for west to east movements from Hale Road to Wilmslow Road. There are also increased delays with north to south movements (Runger Lane to Hale Road (West), Wilmslow Road (East) and M56 Southbound slip roads) mainly due to the extra traffic signals and increased road length. This increase in journey time especially impacts upon pedestrians and cyclists, due to the limited provision for active travel through the gyratory. This presents a significant increase in journey length and time for active travel and undermines the resilience of GM's local network and Right Mix Vision for at least 50% of all journeys within Greater Manchester to be made by active travel and public transport by 2040.</p>
5.1.11	<p>In order to support the Right Mix vision, it is essential that the use of land and provision of parking spaces at the Airport Station does not encourage the unnecessary use of car-based trips to access or egress it, or as a 'park and ride' between it and the high-speed station at Manchester Piccadilly.</p>
5.1.12	<p>At present, the Bill proposes that over 95% of passengers to the Airport Station will arrive by road with 3,782 car parking spaces being made available at the station. This is manifestly excessive. The Airport Station needs to be designed from the outset with wider connectivity by active travel, public transport and shared mobility in preference to access/egress by car. The car park specifications and travel plans for station access and egress by staff and passengers should be agreed with TC and other GM local highway authorities prior to first opening.</p>
5.1.13	<p>Local partners, with National Highways, DfT, HS2 Limited, have sought to develop and agree a multi-modal future proofed transport solution that addresses the cumulative highways and transport requirements of future developments in the Airport area, including HS2. However, this work was put on hold in early 2021 as it is understood that HS2 Ltd has been considering highways, including the SRN, in the vicinity of the Airport further. There has been a lack of visibility of any work being carried out by HS2 Ltd with National Highways, despite frequent requests for meaningful engagement. It is therefore not clear if National Highways has approved the Bill proposals or their impacts on the M56 Junction 6.</p>
5.1.14	<p>In addition, TfGM is currently undertaking a wider connectivity study for the Airport Station. The overall aim of this study is to identify a set of schemes that deliver the stakeholder partners' ambitions for the study area, providing connectivity to and from the Airport Station for the benefit of its users.</p>
	<p>Request:</p>
5.1.15	<p>TC requests that the Promoter be required to give an undertaking to work with TC, TfGM, National Highways and relevant highway authorities to develop and</p>

agree an appropriate and effective station access design and multi modal access strategy for the Airport Station and to bring forward proposed amendments to the Bill and supporting documents for a design that:

- a) Includes a revised M56 Junction 6 design;
- b) Mitigates the predicted significant adverse impacts of the Proposed Scheme on the local highways network;
- c) Supports active travel in line with national and local guidance, including the provision of appropriate pedestrian and cycling infrastructure e.g. secure cycle parking, electric charging infrastructure provision and co-located shared mobility options to reduce car trips, for example, cycle hire and E-cargo bikes etc.;
- d) Reduces the level of car parking and increases cycle parking provision to at least 20% of the car parking provisions in line with the 2040 Transport Strategy;
- e) Takes into account planned and/or committed developments, including NPR and PfE allocations;
- f) Includes the provision of the powers to construct Metrolink and a connection into the Metrolink Western Leg as requested above; and
- g) Does not preclude the provision and improvement of existing and future public transport mode infrastructure in the Airport area.

5.1.16 TC also requests that the Promoter be required give an undertaking that he will restart the South Manchester transport and highways work that was put on hold in 2021.

5.1.17 TC also requests that the Promoter be required to give an undertaking that use of the car park and associated pricing mechanisms will be developed and agreed with TC and TfGM for the Airport Station to ensure that the pricing strategy supports the holistic approach to wider connectivity and the 2040 Transport Strategy.

5.1.18 TC further requests that the Promoter be required to give an undertaking that he will consult and work collaboratively with TC, the relevant highway authorities and TfGM to agree and deliver mitigation in addition to a revised design for access for the predicted significant adverse traffic effects of the Proposed Scheme around Manchester Airport, particularly in respect of Hale Road and the gyratory.

5.2 No service for passengers from Manchester Airport High Speed Station to Manchester Piccadilly

5.2.1 The Proposed Scheme provides for passengers to travel from Manchester Piccadilly to the Airport Station but does not currently provide for a return journey from the Airport Station to Manchester Piccadilly which would have a positive impact on the economies, regeneration potential and employment markets for Trafford and GM.

Request:

- 5.2.2 TC requests that the Promoter be required to give an undertaking that two-way connection between the Airport and Piccadilly high-speed stations will be provided when the service programme for HS2 Phase 2b is published.

6 Construction and Operation Concerns**6.1 Road Congestion Associated with Construction**

- 6.1.1 TC has concerns over the lack of information in the Bill proposals on the full extent of the construction related impacts in the vicinity of the Airport area. TC is also concerned that the proposals contained within the Bill do not include adequate provision for mitigation of traffic impacts which will arise during construction of the Proposed Scheme.
- 6.1.2 The ES does not provide information on the cumulative number of construction vehicles expected on the local road network in the Airport area during the peak month of construction, neither does it identify the month/s this overall peak period will cover. Instead, the ES indicates that approximately 1757 Cars/LGV per day and 1692 HGVs per day in the “busy period” and in the region of 2124 Cars/LGV per day and 2062 HGVs per day in the “peak period” will be using the local road network.
- 6.1.3 As mentioned above, the highways modelling used in the ES assumes the Rainbow Works would have been delivered before construction of Proposed Scheme highways works and that Runger Lane would be used as a construction route. The Rainbow Works are currently not committed developments and the Bill proposals are placing reliance on road infrastructure that will not be in place. Runger Lane is not appropriate for construction traffic in its current state.
- 6.1.4 The addition of vast quantities of construction vehicles on the wider local road network in the Airport area during the planned construction period of circa 10 years will worsen congestion in this area, reduce the attractiveness of Manchester Airport and surrounding areas exacerbating congestion across the south of the conurbation with negative impacts on the local economy, amenity and environment. It will also adversely impact on freight journeys using the roads around Manchester Airport.
- 6.1.5 It is therefore essential that more appropriate methods of moving spoil and construction materials in the Manchester Airport area are adopted.
- 6.1.6 Alternative spoil and materials movement methods such as the use of a conveyor/railhead system or a haul route connecting to the Mid-Cheshire Line would help reduce construction traffic movements on the local highway network and serve to avoid much of the expected significant adverse construction environmental effects. These methods have been adopted by the Promoter on earlier phases of the scheme. If built in the right way, they also provide the opportunity for legacy value to help enable permanent links to be established between the Mid-Cheshire line and the Airport Station, enhancing the multi modal approach to station access that is missing from the current proposals.

Request:

- 6.1.7 TC requests that the Promoter be required to give an undertaking that he will agree a mechanism and process with TC by which he will comprehensively investigate the use of alternative methods for the movement of spoil offsite for disposal and importation of materials to the Airport area including a full appraisal of the carbon impact of using rail to transport materials when compared to the use of road. The results of this investigation should then be shared with TC, TfGM, MCC and GM Partners and the Bill should be amended as necessary and as agreed with TC, TfGM, MCC and GM Partners in order to implement any alternative method which would have less adverse environmental and traffic effects than the currently proposed method.
- 6.1.8 TC requests that the Promoter be required to give an undertaking that he will work collaboratively with TC, TfGM, MAG and the relevant highway authorities to identify and agree a construction traffic management plan which does not include the Rainbow Works and then an undertaking subsequently to make any necessary amendments to the Bill in order to implement the agreed plan and promote any amendments to the Bill that may be necessary to do so.
- 6.1.9 TC requests that the Promoter be required to give an undertaking that he will work collaboratively with the relevant highway authorities, to design, agree and deliver appropriate and coordinated mitigation for the aforementioned traffic effects in line with appropriate design standards and Greater Manchester's Transport Strategy 2040 and an assurance that the agreed mitigations will be delivered prior to the impacts materialising.

6.2 Construction Traffic Issues

- 6.2.1 TC is concerned that the construction of the Proposed Scheme in an area of growth in Trafford, adjacent to the M56 and Manchester Airport, taken together with the disapplication of certain highways and street works legislation which would ordinarily allow TC to control the timing of those works (which is considered further below) means that the potential impacts on transport and connectivity in the area will be severe and are not currently assessed individually or cumulatively in sufficient detail in the ES.
- 6.2.2 TC is concerned that the construction of the high-speed railway and Airport Station will have significant adverse impacts on the transport network in Trafford and GM.
- 6.2.3 TC has particular concerns that a number of roads identified within the ES as construction haul routes are not considered by TC to be suitable for HGV use as the Promoter envisages.

Request:

- 6.2.4 TC requests that the Promoter be required to give an undertaking that:
- a) He will agree with TC mitigation measures to be implemented in advance of construction works commencing in order to address the adverse impact of the construction of the Proposed Scheme on the local road network, in particular around Timperley Wedge and Manchester Airport. Such mitigation measures should include but not be limited to:

- i. Measures to ensure connectivity for residents and businesses in the area as well as neighbourhoods affected by the Proposed Scheme;
- ii. Establishing and agreeing a mechanism with TC and other key stakeholders in the area to provide alternative pedestrian routes during the construction of the Airport Station and at other locations along the Manchester route, including other significant built infrastructure locations which impede connectivity;
- iii. A commitment to plan the roadworks collaboratively with TC, MCC and TfGM, so as to ensure that the amount of disruption is minimised as far as is reasonably practicable. Such planning should include identifying appropriate infrastructure measures, as well as softer measures such as public information and communications, and compensation to affected businesses; and
- iv. A joint traffic and transport plan relating to construction to be agreed with TC, MCC and TfGM so as to mitigate the impact of the works. In the absence of agreement between the nominated undertaker, TC and other relevant local authorities, the parties will agree that the matter be referred for independent determination by an arbitrator or mediator or be determined by the Secretary of State.

6.3 Road Maintenance Strategy

- 6.3.1 TC is concerned that many of the roads used during the construction phase will suffer considerable and sustained damage due to significant additional vehicle movements.
- 6.3.2 The Code of Construction Practice (CoCP) makes no reference to any obligation on the part of the nominated undertaker to repair public highways damaged during the construction phase or to reinstate them to the original standard and character following the completion of works. The CoCP simply requires that highways are left 'in a clean and tidy condition in accordance with the reasonable requirements of the Highway Authority'.
- 6.3.3 As local highway authority, TC considers it unreasonable that it should be responsible for funding and carrying out works of repair and reinstatement during construction or following the completion of the works.
- 6.3.4 TC is also concerned that the Bill does not contain any provision to address the additional costs that will be incurred by local highway authorities in maintaining new highway assets created by the Promoter.
- 6.3.5 TC is also concerned that the Proposed Scheme will result in additional maintenance responsibilities for construction routes, new highway structures and diversions, such as winter maintenance. These will cause an additional resource and financial burden to TC. The Bill contains limited provision for these expenses to be reimbursed where TC can prove an additional financial burden. Maintenance of such routes is, in general, a programmed and planned regime. Reactive, unplanned and ad hoc maintenance, which may be required by the Promoter in connection with the Proposed Scheme, is inevitably more expensive and less reliable than that which is programmed in advance.

Request:

- 6.3.7 TC requests that the Promoter be required to give an undertaking that he will:
- a) Carry out and fund all necessary remedial and repair works to the highway and any necessary bridge strengthening works to a standard specified by TC in respect of all highways and bridges for which it is the responsible authority;
 - b) Carry out appropriately regular (as agreed with TC) and detailed condition surveys before, during and after the construction period on land which is to be and is affected by the proposals, particularly on highways which are to be used as worksites or which will be travelled by more than 24 construction vehicles per day for any period of time during the construction of the Proposed Scheme; and
 - c) Produce and agree with TC a remediation strategy for the monitoring and continued maintenance of all highways affected by construction traffic associated with the construction of the Proposed Scheme, which shall be fully implemented during the construction and operation of the Proposed Scheme.
- 6.3.8 TC also requests that the Promoter be required to give an undertaking that, in respect of new highway assets created by the Promoter which are required to be managed by the local highway authority, the Promoter will pay to TC commuted sums calculated on a 30-year index linked basis to provide for maintenance of those assets.
- 6.3.9 TC also requests that the Promoter be required to give an undertaking that an appropriately sized, and index-linked, fund will be made available to TC to enable it to programme in appropriate, adequate and reliable maintenance (including, but not limited to, winter maintenance, gritting and clearing) of the construction routes to the standards required by the Promoter such that there is no additional financial burden on TC.

6.4 Communication Strategy

- 6.4.1 TC has statutory requirements to maintain the operational functions of its highways and is concerned that it may not receive clear, timely and accurate information regarding the use of the road network by the Promoter and his contractors during the construction of the Proposed Scheme.

Request:

- 6.4.2 TC requests that the Promoter be required to give an undertaking that he will produce and agree with TC a Highways Communication Strategy that clearly sets out how the Promoter and its contractors will engage with TC (as local highway authority), local residents and businesses and other road users during the construction of the railway in Trafford.

6.5 Road Closures & Antisocial Behaviour

- 6.5.1 The Bill provides for the temporary and in some cases permanent stopping up of certain highways for which the Petitioner is responsible. TC is concerned that a reduction in the use of such streets may lead to an increase in antisocial behaviour.

Request:

- 6.5.2 TC requests that the Promoter be required to give an undertaking that he will produce and agree with TC a strategy to maintain both temporarily and permanently stopped up highways during construction and operation of the Proposed Scheme which shall include ensuring that any antisocial behaviours associated with the reduced use of such highways including but not limited to, fly tipping, are remedied by the Promoter promptly.

6.6 Impact on Bus Services within Greater Manchester

- 6.6.1 TC is concerned about the predicted moderate and significant adverse effects on bus services in Trafford during construction and operation of the Proposed Scheme. Many of these are high frequency, calling at multiple stops. Changes to these services need to be carefully planned in advance. Further, no account appears to have been taken of the proposed introduction of bus franchising in Greater Manchester.

Request:

- 6.6.2 TC requests that the Promoter be required to give an undertaking to fund a full impact study to assess the potential effects of the Proposed Scheme on bus services, taking account of the 7 year contract life of the proposed franchises, and to agree with TC and TfGM appropriate mitigation measures, including changes to timetables, additional resourcing, bus stop changes and passenger information, for bus services affected by the Proposed Scheme, whether in service or travelling to and from depots.
- 6.6.3 TC also requests that the Promoter be required to give an undertaking that any permanent or temporary changes to bus stops will follow TCs, and TfGM's approved procedures.

6.7 Construction Lorries, HGV Parking and Construction Workers Parking

- 6.7.1 Schedule 25 (Lorries) exempts the nominated undertaker's construction vehicles from orders which would otherwise prevent roads from use by HGVs. Schedule 27 (Local Acts) disapplies highway authority powers under the Greater Manchester Act 1981 which restrict HGV parking on restricted roads and Schedule 30 allows the Secretary of State to direct highway authorities not to make or to alter/amend or revoke Traffic Regulation Orders which it may otherwise use to protect residents from the impacts of HGV traffic and parking.
- 6.7.2 TC is concerned that local communities will suffer impacts from lorry and construction workers parking on residential streets during construction of the Proposed Scheme. HGVs parking in unsuitable locations which do not provide adequate facilities causes anti-social behaviour. Further to this, obstructive parking caused by large volumes of HGVs and construction workers risks congestion on the road network and road safety, particularly for pedestrians where parking takes place half on the footway.
- 6.7.3 The ES does not fully address the issue of parking and loading during construction on residential neighbourhoods around the construction sites and Airport Station. TC is concerned that these residential neighbourhoods will suffer with increased non-residential parking from construction vehicles.

Request:

6.7.4 TC requests that the Promoter be required to give an undertaking that he will secure suitable lorry parking facilities off highway and if highway locations are needed then these may only be used with agreement from TC or the local highway authority as appropriate.

6.7.5 TC also requests that the Promoter be required to give an undertaking that residential communities will not be subject to the impacts of HGV and LGV parking in residential areas and that suitable controls to be agreed between the Promoter and TC will be implemented in order to protect communities.

6.7.6 TC also requests that the Promoter be required to give an undertaking that he and his nominated undertaker will work collaboratively with TC to develop and agree construction workforce travel plans to ensure these align with local aspirations and maximise travel by sustainable modes.

6.7.7 During the construction phase, TC requests that the Promoter be required to give an undertaking that all necessary measures will be provided to protect residential amenity and businesses from on-street parking including the introduction of appropriate TROs, appropriate park and ride sites for construction workers, car-sharing schemes and the provision of access and facilities for cyclists and pedestrians.

6.7.8 TC requests that the Promoter be required to give an undertaking that monitoring of the progress of the Construction Workers Travel Plan (CWTP) will be undertaken continuously with a monitoring report produced every three months to ensure it meets its objectives and targets and that measures to ensure it remains relevant and effective and are promptly adopted.

6.8 Utilities Works

6.8.1 The work to construct the Proposed Scheme will require a significant number of utility works and diversions. TC is concerned that if these are not co-ordinated, they will result in wide scale disruption in the area.

6.8.2 TC is particularly concerned about the potential unintended consequences and impact on the operation of Manchester Airport and the knock-on effects that can give rise to on the local highway networks in particular.

Request:

6.8.3 TC requests that the Promoter be required to give an undertaking to provide TC with survey information for utilities and associated infrastructure, the alternative diversions considered and the final agreed diversions with affected utility companies.

6.8.4 TC requests that the Promoter be required to give an undertaking to work jointly with the utility companies and TC to coordinate utility diversions, agree a proportional level of works and agree appropriate mitigations, including works to 'future proof' utilities infrastructure, to ensure disruption to Manchester Airport and the wider area is minimised and that current levels of accessibility is maintained.

6.9 Sound, Noise and Vibration Impacts

- 6.9.1 TC is concerned that the significant construction period of the Proposed Scheme will give rise to significant adverse noise and vibration impacts on local residents and businesses, living and working in close proximity to the Proposed Scheme.
- 6.9.2 TC contends that there is a lack of detail on sound, noise and vibration mitigation in the CoCP, which in any event will remain in draft until after the Select Committee of your Honourable House has considered this Petition. TC is concerned that the ES identifies several impacted individuals and communities with regard to sound, noise and vibration adverse effects, and often proposes no mitigation at all for said effects. This is wholly unacceptable to TC.

Request:

- 6.9.3 TC requests that the Promoter be required to give an undertaking to produce a robust strategy, in collaboration and agreement with TC, to mitigate all adverse sound, noise and vibration impacts from the construction and operation of the Proposed Scheme. Such mitigation measures should include but not be limited to making sufficient funds available to local residents and businesses who are negatively affected by sound, noise and/or vibration impacts caused by the construction of the Proposed Scheme, to implement such measures as may be necessary to ameliorate these negative impacts in their homes and businesses. Such measures may include triple glazing, sound insulation etc.
- 6.9.4 TC requests that the Promoter be required to give an undertaking to continually monitor the impacts of the construction on residents and businesses to ensure that adequate mitigation is provided for any new adverse impacts which might arise during construction of the Proposed Scheme and to share these findings with TC every quarter, and to subsequently agree any appropriate mitigation measures with TC and thereafter fully implement and fund these in a timely manner.

6.10 Construction Flood Risk

- 6.10.1 The Promoter has not provided an approach to flood events during construction. Given the substantial size of construction camps in Trafford, and the fact that the high-speed line and southern tunnel portal will be directly adjacent to and/or over Timperley Brook, TC has serious concerns with the potential risks associated.
- 6.10.2 In addition, TC is concerned that damage to its assets may occur during the construction of the Proposed Scheme, including the exploratory investigations phase.

Request:

- 6.10.3 TC requests that the Promoter be required to give an undertaking to agree with TC a mechanism and strategy to identify, manage and monitor flood risks during construction of the Proposed Scheme.
- 6.10.4 In addition, TC requests that the Promoter be required to give an undertaking that in the event that any damage is caused to an Open Water Course (OWC)

asset during construction, including early investigation works, the Risk Management Authorities (RMA) will be contacted immediately and a strategy for full remediation shall be agreed with TC, and thereafter fully implemented and funded in a timely manner by the Promoter or nominated undertaker.

6.11 Public Rights of Way (PROW)

6.11.1 TC has concerns regarding a number of locations where PROWs are proposed to be partly or fully stopped up, either temporarily or permanently, in order to deliver the Proposed Scheme.

6.11.2 Footpaths FFP9 (RINGWAY) and FP13 (RINGWAY) run through land which will be used for the 'M56 East Satellite compound' and the associated temporary material stockpile. Neither footpath will be available during the construction of the Proposed Scheme. FFP13 appears to be re-instated during the operational phase of the Proposed scheme, whereas FFP9 appears to be diverted.

6.11.3 Footpaths FFP7 (RINGWAY) and FP16 (RINGWAY), run through the Manchester Airport High Speed Station North Satellite Compound and the associated temporary material stockpile. The construction of the Airport Station in this location requires that these footpaths be permanently stopped up. However, no diversions for either have been identified. Your Petitioner finds this is unacceptable.

Request:

6.11.4 TC requests that the Promotor be required to give an undertaking that:

- (a) The detailed diversion route of FFP9 will be agreed with TC, prior to implementation;
- (b) Footpaths FP13 and FFP9 (as diverted) will be appropriately re-instated, to a standard agreed with TC, prior to their re-opening during the operation of the Proposed Scheme;
- (c) He will work with TC to agree suitable alternative routes for Footpaths FFP7 and FP16, during both construction and operation of the Proposed Scheme;
- (d) The agreed permanently diverted Footpaths FFP7 and FP16 will be appropriately provided, to a standard agreed with TC, prior to their re-opening during the operation of the Proposed Scheme;
- (e) All temporary and permanent alternative PROW routes will be open prior to any closure of existing PROWs and that he will work with TC to establish and agree the most convenient and safest alternative/s;
- (f) PROW users will not be diverted onto the vehicular highway network, without appropriate mitigation measures being put in place first, during construction of the Proposed Scheme; and
- (g) All new or diverted PROWs will be designed according to Equality Act standards and consideration will be given to ramps to improve accessibility where appropriate.

6.12 Location of Temporary Material Stockpile sites and Construction Compounds

6.12.1 TC is concerned about the proximity of construction compounds and temporary materials stockpile sites to residential properties within Hale Barns. TC is strongly concerned about the impact this will have on the residential living conditions of the occupiers of these properties, particularly in respect of visual intrusion, an overbearing impact and impacts on outlook.

6.12.2 This particularly relates to the M56 East Satellite Construction Compound and associated temporary stockpile site which directly back onto the rear gardens of residential properties on Warburton Drive, Warburton Close, Marfield Road, Burnside and Hale Road. Many of these properties have relatively short rear garden areas of around 10m in length. The potential for visual intrusion and impact on residential living conditions from this construction compound and temporary storage area is therefore significant.

6.12.3 The Airport Station North Satellite Compound site and two adjacent temporary stockpile sites would be directly adjacent to residential properties on Brooks Drive and again concerns are raised by TC in respect of the potential impact from visual intrusion on residential living conditions.

Request:

6.12.4 TC requests that the Promoter be required to give an undertaking to provide TC with notice regarding when and for how long each construction compound and temporary material stockpile sites are to be used. Such notice should be provided not less than three months prior to the sites being established.

6.12.5 Further, TC requests that the Promoter be required to give an undertaking to agree a mechanism and governance process with TC by which the Promoter and the Petitioner develop and agree an appropriate landscape/ buffer/ screening mitigation scheme to limit impacts on residential amenity of properties, gardens and/or curtilages that adjoin or are adjacent to a site compound(s) or stockpile site(s) prior to the sites being established.

6.13 Traffic Impacts and Highways Design

6.13.1 TC has a number of concerns regarding the traffic modelling and methodology which have been used to assess predicted impacts during operation of the Proposed Scheme. TC is concerned that this has led to inadequate mitigation measures being proposed.

6.13.2 From information provided within the Bill and supporting documents it is estimated that in 2038 4 junctions and in 2046 9 junctions on the Trafford highway network will suffer a major adverse impact as a result of the Proposed Scheme. No suitable mitigation has been identified by the Promoter to ensure that the network is able to operate as efficiently and safely as possible, nor is there suitable mitigation to support travel by sustainable modes or to protect communities which may be adversely impacted by their proximity to such junctions. These impacts will have direct impacts on TC's statutory duties as Highways Authority.

Request:

6.13.3 TC requests that the Promoter be required to give an undertaking to:

- a) Carry out further assessments with an appropriate traffic model to be agreed with TC; and
- b) Ensure that highway design will be sufficient to meet, or exceed, national design standards such as LTN1/20 and in addition meet locally agreed highway design standards.

6.14 Cycling

6.14.1 TC understands that a number of highways which have designated cycle lanes in Trafford may be required to be used for construction traffic. This will alter the current type and volume of vehicles using the routes, potentially causing safety concerns for cyclists.

Request:

6.14.2 TC requests that the Promoter be required to provide an undertaking that he will consult relevant cycle organisations, such as CTC, in advance of such highways being used by construction vehicles and subsequently provide them with regularly updated information of such use by construction traffic.

6.15 Early works and assets

6.15.1 TC is concerned that early works including utilities works may disrupt its assets, such as highway management services including CCTV and live signage.

Request:

6.15.2 TC requests that the Promoter be required to give an undertaking that TC's assets will not be disrupted without suitable mitigation measures as agreed with TC being implemented to ensure its statutory duties, such as highway management, can be fulfilled at all times during the construction and operation of the Proposed Scheme.

6.16 Tunnel Portals

6.16.1 TC is concerned that residents in the Hale Barns area of Trafford, particularly those living on Hale Road, Hasty Lane, Brooks Drive, Thorley Lane and Shay Lane will be impacted by the South Manchester tunnel portal, which is proposed to be in a shallow cutting in very close proximity to these communities. There is the potential for the design to cause significant adverse harm to the local community by resulting in a greater impact from the noise of operational high speed trains entering and leaving the tunnel, as well as their proximity to the construction site.

6.16.2 TC does not consider that sufficient information or mitigation is provided within the ES to demonstrate that the Tunnel Portal design will not result in adverse environmental effects on these local communities during construction and operation of the Proposed Scheme.

Request:

6.16.3 TC requests that the Promoter be required to give an undertaking to produce detailed mitigation measure strategies, in collaboration and agreed with TC and MCC, to manage and mitigate any adverse impacts on nearby residents and businesses at or in close proximity to the tunnel portal location with regard to sound, noise & vibration, and any other adverse impacts that might arise during construction or operation of the Proposed Scheme.

6.17 General Flood Risk Issues

6.17.1 TC is concerned that the Promoter's ES has relied on old modelling / OS / LIDAR, as current hydraulic models will not include the latest climate change allowances to inform model parameters of its assessment.

6.17.2 TC is therefore concerned that if these allowances have not been factored into the design of siphons or culverts etc., it is highly likely that capacities will have been underestimated.

Request:

6.17.3 TC requests that the Promoter be required to give an undertaking that he will:

- (a) Carry out detailed surveys of all affected water assets in Trafford, in accordance with hydraulic models which include the latest climate change allowances, prior to the detailed design stage;
- (b) Share the findings of such surveys with TC within 7 days of their completion;
- (c) Agree appropriate detailed designs with TC for those parts of the Proposed Scheme which may affect water assets in Trafford; and
- (d) Agree with TC and implement adequate mitigation measures in respect of any water assets in Trafford which will be affected, prior to commencement of the relevant works.

7 Schedule 5 – Highways**7.1 Highway Consent**

7.1.1 TC is concerned that the powers set out in the Bill do not provide it with sufficient powers or resources to successfully manage the road network.

7.1.2 TC has concerns that the technical approvals process for highway works as proposed in the Bill and its supporting documents, which only allows for 28 days for technical approvals, does not give TC as a relevant highways authority sufficient time to give appropriate consideration to what may be highly complex approvals, meaning that it will be unlikely that it will be able to provide consent or approval within that timescale.

7.1.3 In addition TC is concerned that the construction of the Proposed Scheme, taken together with the disapplication of certain highways and street works legislation which would ordinarily allow TC to control the timing of those works (which is considered further below) means that the potential impact on transport and connectivity across the borough will be severe.

7.1.4 Under clause 3 of and Schedule 5 to the Bill the nominated undertaker may stop up and otherwise interfere with various highways in connection with the authorised works. Schedule 5 disapplies a range of highways and street works legislation.

Request:

7.1.5 TC requests that the Promoter be required to give an undertaking that complex items of work and/or applications will be subject to longer approval periods than 28 days, such items of work and periods to be agreed with TC.

7.1.6 TC requests that the Promoter be required to give an undertaking that he will direct the nominated undertaker to work with TC and partners to provide comprehensive programmes for consents and approvals and work with TC during the pre-application stage of detailed design to ensure that approval can be granted in the required timescales.

7.2 Greater Manchester Road Activity Permit Scheme (GMRAPS)

7.2.1 TC is concerned that the powers conferred over the highway in the Bill and the design of the Proposed Scheme will prejudice TC's statutory duties.

7.2.2 The Bill exempts the Promoter and its nominated undertaker from permit schemes. TC participates in the GMRAPS along with other GM authorities and uses it to coordinate highway activity. The Promoter's exemption from the GMRAPS will severely hamper TC's ability to carry out its functions as a highway authority.

Request:

7.2.3 TC requests that the Promoter be required to give an undertaking that he and his nominated undertaker will participate in the GMRAPS.

7.2.4 TC requests that the Promoter be required to give an undertaking that he will not seek to exercise powers conferred by the Bill with regard to inhibiting TC's plans to implement local highway schemes committed to in local policies, aimed at modal shift of traffic towards more sustainable modes of transport.

7.3 Addition of Secretary of State as Statutory Consultee for Traffic Regulation Orders

7.3.1 The Bill adds the Secretary of State to the list of statutory consultees for the purposes of Traffic Regulation. Given the pipeline of potential highway projects that TC has, there is concern that the statutory consultation stage is too late to share proposals and may risk costly abortive work.

7.3.2 Furthermore, the Bill provides powers by which TC can be directed to promote, amend and revoke Traffic Regulation Orders. This is a costly and time-consuming process for which additional resources would be required.

7.3.3 Furthermore, TC, and Greater Manchester authorities, have committed to substantial mode shift, towards sustainable travel modes, through adopted policies, including the Greater Manchester 2040 Transport Strategy, aimed at modal shift of traffic towards more sustainable modes.

Request:

- 7.3.4 TC requests that the Promoter be required to give an undertaking that he will direct the nominated undertaker:
- a) To put in place a mechanism which would allow TC to plan and share proposed TROs with the Secretary of State and the Promoter at the earliest opportunity;
 - b) To share TRO requirements and develop them in conjunction with TC; and
 - c) To provide TC with the necessary resource and funding should TC be required to implement, amend or revoke existing orders on behalf of the Promoter.
- 7.3.5 TC also requests that the Promoter be required to give an undertaking that he will not seek to exercise powers which may inhibit the implementation of local highway schemes committed to in local policies.

7.4 The additional burden of Schedule 5 applications and pre-application engagement

- 7.4.1 TC has concerns with Schedule 5 of the Bill and the Environmental Minimum Requirements Annex 2: Planning Memorandum. The concerns relate to the additional burden that will be placed on TC by the Promoter in connection with the Proposed Scheme through the number of requests for approval under Schedule 5 and for pre-application discussions.
- 7.4.2 TC has the provision of the new Airport Station, tunnel portal, along with the high-speed railway and other highway changes to process.
- 7.4.3 TC is concerned that the burden of these additional requests for approval will have a significant impact on the level of resources needed to deal with these in the manner required to become a qualifying authority.

Request:

- 7.4.4 TC requests that the Promoter be required to give an undertaking that he will provide TC with sufficient additional resources at the appropriate professional levels to deal with the additional burden placed on it by the Bill, in respect of requests for approval under Schedule 5, pre-application engagement and other necessary requests in respect of the works approved by the Bill.
- 7.4.5 TC requests that the Promoter be required to give an undertaking that (in respect of the above) he will provide TC with:
- a) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme prior to Royal Assent. This must be on a full-time basis for the entirety of the period up to Royal Assent; and
 - b) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme post Royal Assent. This must be on a full-time basis for the entirety of the construction period and for a reasonable time once the Proposed Scheme is operational.

8 Section 4 and Schedule 6 – Power to acquire land compulsorily

8.1.1 TC is concerned that the Bill would allow the Promoter to permanently acquire extensive areas of land including land that is only necessary for construction purposes.

Request:

8.1.2 TC requests that the Promoter be required to give an undertaking that he will exercise temporary possession powers rather than permanent acquisition powers in respect of land which is required for construction purposes only.

9 Schedule 17 — Conditions of deemed planning permission**9.1 Planning Functions**

9.1.1 Clauses of the Bill put in place an alternative planning regime. TC is strongly concerned that this process, supplemented by the Environmental Minimum Requirements (EMRs), does not give TC as a local planning authority sufficient time to make proper decisions on the detail of the Proposed Scheme.

9.1.2 TC notes that the planning regime set out in the Bill is very similar to that contained in both the Channel Tunnel Rail Link Act 1986 and the Crossrail Act 2007. However, there is one significant difference that causes TC concern, namely sub-paragraphs 4(7), 6(6) & 7(10) of Schedule 17 to the Bill. These sub-paragraphs state that the relevant planning authority may impose conditions on approval of detailed plans and specifications only with the agreement of the nominated undertaker. TC notes that the scope of this provision was narrowed further by the 21 July 2022 judgment of the High Court in the case of Buckinghamshire Council v Secretary of State for Transport, Secretary of State for Levelling Up, Housing and Communities, and High Speed Two (HS2) Ltd.

9.1.3 This provision could render TC unable to impose necessary and appropriate conditions and should be removed from the Bill.

9.1.4 TC's concern applies to any other provision in the Bill in which authorities are given powers to impose conditions on other matters, only with the agreement of the nominated undertaker.

Request:

9.1.5 Amendments should be made to the Bill to allow for the relevant determination period of 13 weeks in respect of the agreed Key Design Elements (KDE) and other significant developments of the Proposed Scheme.

9.1.6 Amendments should be made to the Bill to remove sub paragraphs 4(7), 6(6) & 7(10) part (a) of Schedule 17.

9.2 The definition of temporary other construction works

9.2.1 TC has concerns with Schedule 17, paragraph 3 (8) and (9) of the Bill. The concern is that this provision (which is a change from the HS2 Phase 2a High Speed Rail (West Midlands to Crewe) Act 2021) would allow some forms of development i.e., other construction works, for up to 2 years that could have a considerable local impact yet not be subject to any control by TC.

Request:

- 9.2.2 Amendments should be made to the Bill to reduce the time period for works which are considered to be temporary to 6 months; bringing it back in line with the provisions of the HS2 Phase 2a High Speed Rail (West Midlands to Crewe) Act 2021.

9.3 The lack of a validation process

- 9.3.1 TC has concerns with Schedule 17, paragraph 24 (5) of the Bill and the Environmental Minimum Requirements Annex 2: Planning Memorandum.
- 9.3.2 Your Petitioner welcomes the clarification in this paragraph as amended from the HS2 Phase 2a High Speed Rail (West Midlands to Crewe) Act 2021, that the submission of information is a statutory requirement and is relevant to the determination period timescales.
- 9.3.3 However there are serious concerns about the lack of a validation process and detail as to what level of information is required. Requests for approval will not have to comply with the local validation checklist.
- 9.3.4 TC is also concerned that without a clear set of expectations of what information should be submitted with a request for approval, the efficiency and effectiveness of the process could be undermined for all parties. Evidence from earlier phases suggests that standard practices had emerged that could provide a model/template which would add clarity for all parties.

Request:

- 9.3.5 TC requests that the Promoter be required to give an undertaking to agree a mechanism and governance process with TC by which the Promoter and the Petitioner develop and agree an appropriate model/template list of validation requirements which will be incorporated into the Planning Memorandum as a good practice guide to assist relevant planning authorities including TC, and the nominated undertaker in agreeing the relevant level of information required for each type of approval application which shall then be implemented.

9.4 Planning Memorandum

- 9.4.1 TC has concerns with the Planning Memorandum. Paragraph 7.2.2, which does not acknowledge that new issues may legitimately be raised by statutory consultees and elected members following pre-application discussions and once post application.
- 9.4.2 Government guidance set out in the NPPG (Paragraph: 011 Reference ID: 20-011-20140306) sets out that pre-application advice could be a material consideration and TC considers this should be followed in these circumstances.

Request:

- 9.4.3 TC requests that the Promoter be required to give an undertaking that the Planning Memorandum will be amended to acknowledge that in some cases it is legitimate for additional issues to be raised and addressed during the determination process. In particular, paragraph 7.2.2 should be amended as follows:

- a) Replace 'will' with 'can'; and
- b) Replace 'best' with 'reasonable'.

9.5 The additional burden of Schedule 17 applications and pre-application engagement

- 9.5.1 TC has concerns with Schedule 17 of the Bill and the Environmental Minimum Requirements Annex 2: Planning Memorandum. The concerns relates to the additional burden that will be placed on the TC as a result of the number of requests for approval under Schedule 17 and for pre-application discussions.
- 9.5.2 TC has the provision of the new Airport Station, tunnel portal, along with the high-speed railway and other highway changes to process.
- 9.5.3 TC is concerned that the burden of these additional requests for approval will have a significant impact on the level of resources needed to deal with these in the manner required to become a qualifying authority. In line with the Planning Memorandum, it is expected that the level of pre-application engagement will be high, and particularly for the Airport Station this will be extensive.
- 9.5.4 While the principle of pre-application engagement is strongly endorsed and supported, there is concern that these changes put considerably more burden on TC than the Promoter.

Request:

- 9.5.5 TC requests that the Promoter be required to give an undertaking that he will provide TC with sufficient additional resource at the appropriate professional level to deal with the additional burden placed on it by the Bill, in respect of requests for approval under Schedule 17, pre-application engagement and other meetings in respect of the works approved by the Bill.
- 9.5.6 TC requests that the Promoter be required to give an undertaking that (in respect of the above) he will provide TC with:
 - a) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme prior to Royal Assent. This must be on a full-time basis for the entirety of the period up to Royal Assent; and
 - b) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme post Royal Assent. This must be on a full-time basis for the entirety of the construction period and for a reasonable time once the Proposed Scheme is operational.

10 Schedule 18 – Listed Buildings

10.1 Buildings authorised to be demolished, altered or extended

- 10.1.1 TC has concerns with Schedule 18 to the Bill.
- 10.1.2 Enforcement action or an urgent works notice could still be required to a listed building during construction of the Proposed Scheme. Works undertaken pursuant to the Bill should not preclude the removal of unauthorised works or the consolidation and stabilisation of listed buildings which will not be demolished as part of the Proposed Scheme.

10.1.3 Not being able to remove unauthorised works or undertake urgent works during construction of the Proposed Scheme even where these will later be rendered ineffective or substantially ineffective could impact on the long-term survival of listed buildings.

Request:

10.1.4 Amendments should be made to the Bill to ensure that sections 38 (1), 42(1) & 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990 still apply to ensure the long-term survival of listed buildings. This should also be clarified in the Heritage Memorandum.

10.2 Buckhall, The Four Seasons Hotel, Wilmslow Old Road, Grade II is proposed for complete demolition

10.2.1 TC is concerned that the assessment undertaken in the ES in relation to the above building which is proposed for complete demolition is inadequate, as no works are proposed to re-site, salvage or record this Grade II Listed Building.

Request:

10.2.2 TC requests that the Promoter be required to give an undertaking that he will:

- a) Undertake an appropriate assessment of the Buckhall (Marriot) Four Seasons Hotel, Grade II listed building;
- b) Set out appropriate recording and mitigation for the loss of the listed building in consultation with TC, and
- c) Make provision for the interpretation of the listed building and advance understanding of the significance of the heritage asset.

10.3 Permanent Effects on Designated and Non-Designated Heritage Assets

10.3.1 TC is concerned that the permanent effects of the Proposed Scheme will have a significant impact on the setting of a number of designated and non-designated heritage assets at Davenport Green and the setting of the South Hale Conservation Area.

10.3.2 The Proposed Scheme will drastically change the rural landscape character which contributes strongly to the setting of these heritage assets. The impact on these heritage assets has not been adequately assessed or mitigated.

Request:

10.3.3 TC requests that the Promoter be required to give an undertaking that he will:

- a) Undertake further assessment of the permanent effects of the Proposed Scheme on all affected designated and non-designated heritage assets, including (but not limited to) the setting of Davenport Green Hall (Grade II listed) & Davenport Green Farmhouse (Grade II listed) and the setting of the South Hale Conservation Area;
- b) Agree design principles of all proposed relevant infrastructure with TC and Historic England, in order to agree adequate heritage mitigation and remediation measures (including robust landscaping where relevant); and

- c) Provide full details of noise and vibration mitigation at the detailed design stage, which should support further assessment of the potential effects of the operation phase on heritage assets. Any acoustic measures required to affected heritage assets will need to be bespoke, preserve their significance and be agreed with TC and Historic England prior to implementation.

10.4 Effect on Timber Framed Listed Buildings

- 10.4.1 TC is concerned that noise and vibration impacts associated with the construction of the Proposed Scheme will permanently affect the condition and stability of timber framed listed buildings.

Request:

- 10.4.2 TC requests that the Promoter be required to give an undertaking to carry out the following in respect of all timber framed buildings (e.g. Davenport Green Hall):

- (a) To undertake specialist noise and/or vibration surveys, the scope of which should be agreed with TC;
- (b) Undertake appropriately regular structure condition monitoring during construction and provide the results of such monitoring to TC within 7 days; and
- (c) Agree and implement adequate remediation and mitigation measures required to protect these structures prior to and during construction of the Proposed Scheme.

10.5 The additional burden of Schedule 18 applications and pre-application engagement.

- 10.5.1 TC has concerns with Schedules 17 and 18 to the Bill and the Environmental Minimum Annex 3: Heritage Memorandum. The concerns relate to the additional burden that will be placed on TC by the Promoter through the number of requests for approval under Schedule 17 and for pre-application discussions.

Request:

- 10.5.2 TC requests that the Promoter be required to give an undertaking that he will provide TC with sufficient additional resource at the appropriate professional level to deal with the additional burden placed on it by the Bill, in respect of requests for approval under Schedule 17, pre-application engagement and other meetings in respect of the works approved by the Bill.

- 10.5.3 TC requests that the Promoter be required to give an undertaking that (in respect of the above) he will provide TC with:

- a) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme prior to Royal Assent. This must be on a full-time basis for the entirety of the period up to Royal Assent; and
- b) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme post Royal Assent. This must be on a full-time basis for the entirety of the construction period and for a reasonable time once the Proposed Scheme is operational.

11 Schedule 19 – Ancient Monuments

11.1.1 TC is concerned that the permanent effects of the proposed scheme which includes the River Bollin East Viaduct will have a significant impact on the setting of Watch Hill, an Ancient Monument. This work will drastically change the rural landscape character which contributes strongly to the setting of this designated heritage asset. The impact on this Ancient Monument has not been adequately assessed or mitigated against in the ES.

Request:

11.1.2 TC requests that the Promoter be required to give an undertaking that he and/or the nominated undertaker will:

- a) Undertake further assessment of the permanent effects of the Proposed Scheme on Watch Hill;
- b) Agree design principles of all proposed infrastructure with TC; and
- c) Agree suitable and adequate remediation and mitigation measures (including robust landscaping) with TC and Historic England to protect the setting of the Ancient Monument.

12 Schedule 21 – Water**12.1 Risk Management Authority (RMA) Impacts**

12.1.1 TC is concerned that the Bill overrides legislation which TC relies upon, in part, to manage local flooding risks.

12.1.2 Specifically, TC is concerned that RMAs will not be consulted, or involved, during the detailed design stage of development, which poses a significant risk not only to the Proposed Scheme but future developments in Trafford.

Request:

12.1.3 TC requests that the Promoter be required to give an undertaking that it shall gain consent from the RMAs in the following instances associated with the implementation of the Proposed Scheme:

- a) Proposed discharge to any receptor, including connection point and rate;
- b) Decommissioning of sewers including evidence of sufficient capacity in the extant system to take the diverted flows/volumes and manage risk of surface water flooding; and
- c) Discharge during dewatering to the public sewer or any other receptor and evidence to ensure no capacity or increased flooding risk.

13 Schedule 24 – Street Works

13.1.1 TC is concerned that Schedule 24 disapplies existing powers that it possesses to give direction as to the timing of proposed street works, placing of apparatus in roads and designated protected streets. All street works will to some extent reduce the width of the street available to traffic, pedestrians, and other users. Consequently, TC is concerned about the significant disruption the Proposed Scheme will cause to businesses and residents and the resultant adverse social, economic and environmental impacts if they are not properly co-

ordinated with other street works. TC notes that this has been an issue on Phase 1 of HS2, where HS2 works have not been co-ordinated with other works.

13.1.2 GMRAPS was implemented in 2013 and is a process used and supported by the 10 highway authorities of Greater Manchester which takes account of proposals and duration of works across Greater Manchester's Road network, considers the cumulative effects on the network with the aim of managing and maintaining the local highway network to maximise the safe and efficient use of road space and provide reliable journey times.

13.1.3 Schedule 24 effectively removes the requirement for the Promoter and their nominated undertaker to participate in GMRAPS. TC is concerned that the removal of this requirement will make coordination and network management functions in Greater Manchester harder to coordinate. This will have significant negative consequences if allowed to happen within the Manchester Airport area which is a major economic hub for the North.

Request:

13.1.4 TC requests that the Promoter be required to give undertakings that he will direct the nominated undertaker to:

- a) Plan roadworks collaboratively with TC to ensure that disruption is minimised as far as is reasonably practicable. Such planning is to include identifying appropriate mitigation measures, including infrastructure measures as well as softer measures such as public information and communications;
- b) Agree with TC a joint traffic and transport plan relating to construction so as to mitigate the impact of the works. In the absence of agreement between the nominated undertaker and TC, the parties will agree that the matter be referred for independent determination by an arbitrator or mediator to be determined by the Secretary of State;
- c) Adopt the GMRAPS. The co-ordination of roadworks is essential to ensure disruption from the works are kept to a minimum. All roadworks will have varying levels of disturbance and the GMRAPS is a scheme for local authorities to assess roadworks before they can be carried out on the highway; and
- d) Support the enhancement of existing monitoring and intervention capabilities within Greater Manchester to ensure a cross-agency monitoring and control centre is set up which shall include technology such as CCTV and variable messaging signs, that will be capable of monitoring key parts of the affected road network and actively manage the network through the construction period and for 5 years post opening and to implement any mitigation identified as needed.

14 Schedule 26 – Noise

14.1 Sound, Noise and Vibration

14.1.1 TC is concerned that there is significant potential for ground-borne noise and vibration impacts during both construction and operational phases of the Proposed Scheme. The main sources of ground-borne noise and vibration during construction are: Tunnel Boring Machines (TBMs), Piling activities and

Vibro-compaction. During the operational phase, the main source of ground-borne noise and vibration is the operation of the high-speed rail line.

14.1.2 TC also has concerns about air-borne sound and noise during construction and operation, principally arising from plant and machinery, traffic and the running of high-speed trains.

14.1.3 TC is concerned that due to Schedule 26 modifying the normal noise controls under the Control of Pollution Act 1974 and Environmental Protection Act 1990, a substantial number of complaints will be submitted to TC for investigation and resolution.

Request:

14.1.4 TC requests that the Promoter be required to give an undertaking that he will provide TC with sufficient additional resource at the appropriate professional level to deal with the additional burden placed on it by the bill, in respect of noise appeals and complaints, including:

- a) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme prior to Royal Assent. This must be on a full-time basis for the entirety of the period up to Royal Assent; and
- b) The necessary funding required to create dedicated officer positions to properly support the Proposed Scheme post Royal Assent. This must be on a full-time basis for the entirety of the construction period and for a reasonable time once the Proposed Scheme is operational.

15 Schedule 32 – Protective Provisions

15.1 Inverted Siphon

15.1.1 TC is concerned that the inverted siphon required to deliver the Proposed Scheme will require extensive long-term management and maintenance. It is not clear that the protective provisions for local drainage authorities in Part 4 of Schedule 32 operates to require the Promoter to retain long-term responsibility for the management of the siphon.

Request:

15.1.2 TC requests that the Promoter be required to give an undertaking that TC will not be responsible for the management and maintenance of the inverted siphon.

15.1.3 TC also requests that the Promoter be required to give an undertaking, to confirm to TC who will be responsible in perpetuity, for the management and maintenance of the inverted siphon and that TC will be indemnified in respect of any claims relating to the inverted siphon.

15.2 Water Asset Interferences

15.2.1 TC is concerned that the Proposed Scheme will interfere with a number of its Land Drainage easements on its watercourses.

Request:

- 15.2.2 TC requests that the Promoter be required to give an undertaking to provide evidence to TC and demonstrate that interferences are unavoidable, and produce a strategy, in collaboration with TC, for the management of such interferences.
- 15.2.3 TC also requests that the Promoter be required to give an undertaking that easement and impact assessments will be undertaken by the Promoter for any culverted assets of TC and shared, for agreement, with TC before any works commence to said assets.

15.3 Inappropriate Construction Routes

- 15.3.1 TC is concerned that several roads identified by the Promoter in the ES (Volume 2 and Volume 5: Transport Assessment) as construction routes are considered unsuitable by TC.
- 15.3.2 The roads have a combination of reasons that make them unsuitable for use as construction routes, such as insufficient carriageway widths, existing heavy vehicle restrictions for safety reasons, and limited visibility splays. The impact of the expected numbers of construction vehicles on these roads will be significant and adverse with negative impact on businesses and residents in the vicinity. This is particularly of concern where the routes are used by non-motorised users.
- 15.3.3 TC is particularly concerned about the proposal to use the following roads:
- a) Roaring Gate Lane;
 - b) Thorley Lane (West);
 - c) Shay Lane;
 - d) Brooks Drive;
 - e) Sunbank Lane; and
 - f) Chapel Lane.

Request:

- 15.3.4 TC requests that the Promoter be required to give an undertaking to engage with TC, TfGM and other relevant highway authorities to:
- a) Identify whether changes are needed to modify Roaring Gate Lane, Thorley Lane (West), Shay Lane, Brooks Drive, Sunbank Lane and Chapel Lane to make them suitable for use as construction routes, including active travel facilities,
 - b) Promote any amendments needed to the Bill and supporting documents to support those changes; and
 - c) Fund and implement those changes as part of the Proposed Scheme.
- 15.3.5 TC requests that the Promoter be required to give an undertaking that he and the nominated undertaker will agree with TC, TfGM and the relevant highways authorities the number and types of construction vehicles that will use the

construction routes listed above and to assess and appropriately mitigate traffic effects on these routes, including cumulative environmental effects.

- 15.3.6 TC requests that the Promoter be required to give an undertaking that he and the nominated undertaker will use the strategic road network where reasonably practicable and confine lorry movements on the local road network to normal worksite hours (limiting movements during peak hours).

15.4 Significant Adverse Residual Impacts – Junctions

- 15.4.1 The ES reports that over 200 junctions within Greater Manchester would be subject to significant adverse effects arising from increased congestion and delays during construction and operation of the Proposed Scheme. These effects are spread across 8 of the 10 districts of Greater Manchester.

- 15.4.2 It is therefore inadequate for the ES to propose no mitigation measures apart from a statement that “HS2 Ltd will work with the relevant highway authorities to seek to reduce the impacts of the Proposed Scheme at these locations insofar as reasonably practicable”.

Request:

- 15.4.3 TC requests that the Promoter be required to give an undertaking to work collaboratively with TC, TfGM and other relevant highway authorities, to design, agree and deliver such appropriate and coordinated mitigation for the predicted significant adverse traffic effects of the Proposed Scheme, considering active modes and Public Transport where appropriate.

15.5 Road Safety

- 15.5.1 TC is aware of efforts by the Promoter to prevent and reduce road risk associated with the delivery of other stages of HS2, however the increased traffic and activity associated with construction and defined routes will prejudice road safety as an increase in construction traffic, including large or heavy goods and construction vehicles will increase road danger, particularly for vulnerable road users that are not protected by the structure of a motor vehicle.

Request:

- 15.5.2 In light of the concerns above and the specific road dangers posed by the Proposed Scheme over a sustained period, TC is requesting that the Promoter be required to enter into an undertaking:

- a) To provide road safety funding to deliver a comprehensive package of road safety infrastructure improvements along routes and junctions impacted by the Proposed Scheme to mitigate its operational impacts and provide a legacy to the local communities;
- b) That the Promoter and the nominated undertaker apply the highest vehicle, driver, and systems standards to minimise the work-related road risk posed by construction related traffic. This should include the implementation of the Construction Logistics and Community Safety (CLOCS) standard; and Fleet Operator Recognition Scheme (FORS) accreditations;

- c) To provide additional maintenance funding to ensure that repairs and renewals required during the operational phase of the Proposed Scheme can be delivered; and
- d) To provide funds to deliver road safety campaigns, interventions, and technology to the communities affected to enable collaborative working with the Promoter and their nominated undertaker, or a joined-up approach to communications and engagement campaigns alongside TC.

15.6 Cumulative Adverse Traffic Effect - Resilience of the Road Network

- 15.6.1 TC has significant concerns regarding the cumulative traffic effects within Trafford. These have neither been fully assessed in the ES nor mitigated.
- 15.6.2 In this context, TC notes that on 6 July 2022, the Promoter deposited Additional Provision 1 ('AP1') together with the amendments removing the Golborne Link, and two supplementary environmental statements: Additional Provision 1 Environmental Statement ('AP1 ES') and Supplementary Environmental Statement 1 ('SES1'). AP1 ES and SES1 changed the number of locations adversely effected by traffic impacts, but this does not change the nature of TC's concern. These documents were also silent on the implications for impacts within community area MA06, so it is not clear if Trafford will suffer further negative impacts, as traffic that may have gone to Wigan is now using the Airport Station.
- 15.6.3 If the various elements of the Proposed Scheme were being progressed by several different developers, developer contributions would have been required to address the cumulative effects of the various aspects of the Proposed Scheme and safeguard the resilience of the road network following an appropriate observation, resilience analysis and modelling of the cumulative effects.

Request:

- 15.6.4 TC is therefore requesting that the Promoter be required to give an undertaking to make a contribution to enable the required mitigation measures to address the cumulative traffic effects of the Proposed Scheme to be delivered.

16 Environmental Concerns

In addition to specific environmental issues raised elsewhere in this Petition, TC has significant concerns relating to the environmental impacts and mitigation in Trafford and throughout the Greater Manchester area.

16.1 Cumulative Environmental Adverse Effects

- 16.1.1 TC has significant concerns that the ES does not adequately assess the cumulative environmental effects of the Proposed Scheme, either inter-project (the cumulative effects with future developments) or intra-project (the totality of effects on individual receptors) reported in the ES and therefore does not include the required mitigation measures to address and monitor these effects.

Request:

16.1.2 TC requests that the Promoter be required to give an undertaking to provide evidence of a cumulative effects assessment, agree the appropriate additional mitigation with TC and other relevant local planning authorities and deliver these mitigation measures accordingly.

16.2 Trafford Air Quality

16.2.1 TC is concerned that the construction works which are to take place to deliver the Proposed Scheme will lead to increases in two of the most serious air pollutants, Nitrogen Dioxide and Particulate Matter (PM10 & PM2.5).

16.2.2 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing health conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas.

16.2.3 Parts of Community Area MA06 are located within the Trafford Council Air Quality Management Area (AQMA). The AQMA has been declared due to levels of Nitrogen Dioxide being close to or exceeding national annual objective levels. Within an AQMA, TC has responsibility to ensure that air quality is protected and improved wherever possible.

16.2.4 Consequently, TC is particularly concerned with the potential adverse impacts on local air quality arising from the construction of the Proposed Scheme namely as a result of:

- a) The significant number of vehicle movements associated with the various construction compounds in the Airport Station area;
- b) The Construction Code of Practice (CoCP) not adequately addressing the key areas of avoidance or protection;
- c) A lack of clarity as to how the CoCP will be implemented in a uniform manner across the Proposed Scheme, leading to a concern that contractors will approach delivery in very different ways; and
- d) Modelled concentrations of particulate matter (PM) including PM10 and PM2.5 not having been subject to model verification and adjustment.

16.2.5 It should be noted that where modelled concentrations are not subject to model verification this potentially may lead to under predicting of concentrations at sensitive receptors.

Request:

16.2.6 TC requests that the Promoter be required to give an undertaking to:

- a) Carry out real-time air pollution monitoring (for Nitrogen Dioxide and Particulate Matter) during the construction and operation phases of the Proposed Scheme;
- b) Carry out modelled particulate concentration air quality modelling of PM10 and PM2.5, which must be subject to verification in accordance with guidance

	<p>contained with DEFRA TG(16). The completed updated assessment shall be submitted to TC for further review and assessment and agreement of appropriate mitigation measures to be implemented and funded by the Promoter thereafter; and</p> <p>c) Provide further mitigation measures and resources to TC to manage the impacts and effects of the construction and operation phases of the Proposed Scheme.</p>
16.2.7	<p>TC requests that the Promoter and the nominated undertaker be required to give an undertaking to:</p> <p>a) Use the lowest emission construction vehicles and machinery available. Construction vehicles should meet the latest European Emission Standard; and</p> <p>b) Provide mains electricity to construction compounds, with generators used in emergency situations only and for short periods of time.</p>
16.2.8	<p>TC requests that the Promoter be required to give an undertaking that he will provide TC with sufficient additional resource at the appropriate professional level to deal with the additional burden placed on it by the Bill, in respect of officers reviewing air quality information, agreeing additional mitigation measures and ensuring compliance of the CoCP by the Promoter and his nominated undertaker during both the construction and operation of the Proposed Scheme.</p>
16.2.9	<p>TC requests that the Promoter be required to give an undertaking that (in respect of the above) he will provide TC with the necessary funding required to create dedicated officer positions to properly support the Proposed Scheme post Royal Assent. This must be on a full-time basis for the entirety of the construction period and for a reasonable time once the Proposed Scheme is operational.</p>
16.3	<p>Air Quality and Greater Manchester's Clean Air Plan</p>
16.3.1	<p>Monitoring of air quality shows that there are illegal levels of Nitrogen Dioxide (NO₂) in Greater Manchester. To address this, the 10 GM local authorities (including TC), GMCA and TfGM are working together to develop a Clean Air Plan to tackle NO₂ exceedances in Greater Manchester and submitted a case for a new Clean Air Plan to Government on 1 July 2022.</p>
16.3.2	<p>The Air Quality assessment presented in the ES does not take any account of this Clean Air Plan nor does it provide any details of how the Promoter will ensure all HS2 construction traffic will meet the 'Euro V1' (diesel) and 'Euro IV' (petrol) standards.</p>
	<p>Request:</p>
16.3.3	<p>TC requests that the Promoter be required to give an undertaking to undertake an Air Quality assessment using the GM Clean Air Plan (CAP) monitoring data as part of its baseline review and modelling works, where TC and TfGM thinks this is appropriate and as defined by the Institute of Air Quality Management guidance (Ref 1 and 2).</p>

- 16.3.4 TC requests that the Promoter be required to give an undertaking that during the construction phase of the Proposed Scheme the Promoter will utilise construction vehicles, plant and machinery which will be compliant with the emission standards set out in the Government's Clean Air Zone Framework and provide evidence of this at a frequency to be agreed with TC and TfGM. Where compliance with these standards are not achieved, TC and TfGM are seeking an undertaking that the Promoter and their nominated undertaker take appropriate action to address these promptly.
- 16.3.5 TC requests that the Promoter be required to give an undertaking to provide robust mitigation during the construction phase for air pollutants (NOx, NO2, and PM) and include a range of appropriate monitoring locations to be agreed with TC and TfGM to ensure the national air quality objective's annual mean concentrations and any additional Environmental targets to be introduced by the Environment Act 2021 are not breached. This will include potential use of low/zero emission No-Road Mobile Machinery and retrofit of rolling stock with pollution control equipment.
- 16.3.6 TC requests that the Promoter be required to give an undertaking to carry out dust monitoring at locations to be agreed with TC and the relevant authorities to provide dust monitoring reports every quarter. Where dust issues are identified TC is seeking an assurance that the Promoter will implement additional and appropriate dust control measures to address these promptly.
- 16.3.7 TC requests that the Promoter be required to give an undertaking to produce local Air Quality Action Plans with robust assessments of the air quality impacts of construction and detailed mitigation measures to be implemented where significant air quality effects are predicted during the construction phase of the development. These shall include consideration of plant and machinery.
- 16.3.8 TC requests that the Promoter be required to give an undertaking to agree and finalise the required Site Specific Local Environmental Management Plan with TC, TfGM, and other relevant authorities prior to construction commencement.

16.4 Climate Change

- 16.4.1 TC is concerned that it is unclear how the produced Greenhouse Gases (GHG) assessment will be used to assess the potential of further carbon reductions of the Proposed Scheme. TC is concerned that a cumulative assessment was not undertaken for the GHG section of the climate change assessment.

Request:

- 16.4.2 TC requests that the Promoter be required to give an undertaking to agree a mechanism and strategy with TC to provide the management and monitoring strategy of GHG's, which shall be in place prior to construction and continue during operation, for a period to be agreed by TC and the Promoter. TC requires the strategy to clarify the reporting process of GHG emissions during the construction phase and who is clearly responsible for auditing carbon emissions against the assessed base levels.
- 16.4.3 Similarly, TC would expect the operational phase of the development to commit to the use of 100% green energy in all HS2 assets as embedded mitigation and should therefore be considered as part of the base case

calculations instead of the sensitivity testing. Further, TC requests that the Promoter be required to give an undertaking to provide detail on the management and monitoring of GHG's during the implementation and operational phases of the Proposed Scheme.

- 16.4.4 TC requests that the Promoter be required to give an undertaking that he will, at detailed design stage, take into consideration all updated or revised guidance or best practice standards regarding the impacts of climate change, relevant to the Proposed Scheme.

16.5 Pests & Rodents

- 16.5.1 TC is concerned that the significant construction associated with the Proposed Scheme will displace pests and rodents to areas which cause nuisance and concern for residents and businesses.

Request:

- 16.5.2 TC requests that the Promoter be required to give an undertaking to agree a robust strategy and mechanism with TC to manage the impacts of pest and rodent displacement throughout the construction of the Proposed Scheme.
- 16.5.3 TC requests that the Promoter be required to give an undertaking to provide TC with the necessary funds required to deal with pest and/or rodent problems and/or infestations reasonably arising from the construction of the Proposed Scheme.

16.6 Land Quality and Contamination

- 16.6.1 TC recognises that a generic set of potential remediation mitigation measures have been presented in the ES (Vol 1, Section 9.10, Page 230).
- 16.6.2 TC notes that site investigations are still to be done and therefore there are still significant unknowns with regards to land quality and contamination. Further, TC is aware that potentially contaminated areas of land have been identified that could affect, or be affected by, the construction of the Proposed Scheme.
- 16.6.3 Additionally, TC understands that potentially contaminated spoil from the tunnelling process is likely to be stored and processed at the South Manchester Portal Tunnelling Compound.

Request:

- 16.6.4 TC requests that the Promoter be required to give an undertaking to:
- a) Carry out detailed site investigation works in relation to sites which have been identified within the Conceptual Site Model (CSM) to potentially pose a contaminative risk;
 - b) Carry out analysis of contaminated land data for the Proposed Scheme and provide the findings of this analysis this to TC and other relevant Local Authorities as soon as it is available, in order for it to be reviewed and assessed;
 - c) Ensure that the Proposed Scheme will be delivered in a manner which ensures that land is improved and successfully remediated, where necessary, and that land betterment is sought at every opportunity in collaboration with TC; and

d) Share completed land/ ground investigations with TC prior to the use of any construction sites associated with the Proposed Scheme.

16.6.5 TC also requests that the Promoter be required to provide an undertaking to agree a bespoke strategy with TC, setting out how site investigations and/or land surveys will be undertaken within potentially contaminated areas within the tunnelled section of the Proposed Scheme.

16.6.6 TC also requests that the Promoter be required to give an undertaking to provide a detailed strategy setting out how the spoil generated from the tunnelling process will be processed and treated to TC and the Environment Agency prior to the tunnelling works commencing.

16.7 Ecology and Nature Conservation

16.7.1 Within the MA06 area, construction of the Airport Station will result in the permanent loss of 1.7ha (50%) of Davenport Green Wood Site of Biological Interest (SBI), of which 0.7ha (54%) is ancient woodland habitat from Davenport Green Ancient Woodland Inventory (AWI) site. The ES states that the loss of semi-natural broadleaved woodland, bird assemblages and ancient woodland will have an adverse effect on the structure and function of the site. The ES considers this will be significant up to the county/metropolitan level at Davenport Green Wood SBI and national level at Davenport Green Wood AWI site.

16.7.2 TC also considers the hedgerow assessment undertaken to support the Bill is insufficient, and that a full assessment is required is to ascertain 'Important' hedgerows under the Hedgerow Regulations, 1997.

16.7.3 Furthermore, the ES also does not take into account the importance of individual street and highway trees of note that are not veteran trees but are still important landscape features.

16.7.4 Despite committing to deliver Biodiversity Net Gain (BNG) of 10% on HS2 Phase 2b, the ES does not present this assessment or the requirement net gain plans.

Request:

16.7.5 TC requests that the Promoter be required to give an undertaking to:

- a) Minimise the amount of ancient woodland lost to construction of the Airport Station. Where this is not practicably possible, the Promoter should ensure that all appropriate protection measures are implemented before construction begins, and are maintained throughout the construction phase;
- b) Ensure all mitigation planting will be delivered to increase habitat corridors and connectivity to existing wooded areas in the immediate surroundings;
- c) Carry out additional ecological surveys within Trafford and GM and provide appropriate mitigation measures where necessary;
- d) Provide a minimum of two for one compensation for all ponds lost, the details of which are to be agreed in writing with TC and other relevant authorities i.e. Greater Manchester Ecology Unit (GMEU);

- e) Provide a comprehensive hedgerow replacement plan and programme in Trafford and GM to be agreed and delivered in collaboration with TC and other relevant authorities i.e. Greater Manchester Ecology Unit (GMEU);
- f) Undertake a full Capital Asset Value for Amenity Trees (CAVAT) assessment on trees of note to ensure a fuller Ecosystem Services understanding and appreciation of their value and function is assessed and appropriate mitigations agreed with TC and subsequently delivered;
- g) Undertake a BNG condition assessment (to the prevailing metric at the time) and produce a BNG delivery strategy in agreement with TC and other relevant authorities demonstrating an overall net gain across the Proposed Scheme and within Trafford and the GM boundaries (with a minimum of 10% net gain for every affected habitat) in line with the Environment Act 2021 and GMCA Biodiversity Net Gain Guidance 2011; and
- h) Allocate additional funds to environmental projects, such as the Green Corridor, as appropriate to reduce and compensate for the impacts of constructing the Proposed Scheme, including the creation of wildlife habitat.

16.8 Major Accidents and Disasters

- 16.8.1 TC is concerned that the major accidents and disasters assessment reported in the ES has not been informed by Greater Manchester's Community Risk Register (GM CRR). The assessment presented in the ES is therefore not comprehensive and the need for additional mitigation has not been identified.

Request:

- 16.8.2 TC requests that the Promoter be required to give an undertaking to work with TC and other relevant authorities to agree the baseline for the assessment to identify any risks and agree the necessary procedures and mitigation measures required in the event of a Major Accident and/or Disaster (embedded in the Proposed Scheme's proposals or otherwise). TC is also seeking an assurance that these measures will be fully and robustly tested and demonstrated to TC and other relevant authorities, prior to the operational stage to ensure they will be effective.

16.9 Electromagnetic Interference

- 16.9.1 TC has concerns that the desktop electromagnetic field (EMF) modelling presented in the ES in addition to concerns relating to EMF risks at Manchester Airport and other locations where interference to television reception could occur is insufficient and does not allow for a true understanding of the Proposed Scheme's electromagnetic interference in Trafford.

Request:

- 16.9.2 TC requests that the Promoter be required to give an undertaking to undertake real-world baseline and post-construction/operational surveys at dwellings/receptor sites closest to the route of the Proposed Scheme to verify the desktop modelling of EMF emissions undertaken for the ES.
- 16.9.3 TC requests that the Promoter be required to give an undertaking to identify the locations where temporary interference to TV reception could occur, with

interference zones determined by direction of signal transmission (for terrestrial and satellite TV) and to fund and deliver appropriate mitigations for areas with predicted adverse impacts which should be agreed with TC and other relevant local authorities.

17 Delivery Strategy and Construction Management

17.1 Need for joint integrated delivery strategy

17.1.1 Delivery of the Bill proposals will involve major construction works in Trafford and in the Airport area specifically, over a significant number of years and a widespread area. The Proposed Scheme is not the only development proposed in Trafford or Greater Manchester.

17.1.2 A mixture of private and public sector-backed developments will also come forward and should not be frustrated by the implementation of the Bill proposals. In particular, given the importance of the Airport area as an international and regional transport hub within the North West, developments around the Airport Station need to be carefully co-ordinated, in order to mitigate impacts on residents, businesses and travellers. In addition, a number of transport related interventions are also needed to fully integrate with the wider GM transport plan and in specific locations require complex integration with the existing transport modes, failure to consider these complexities and requirements of TC, TfGM, GMCA and GM Partners within the Proposed Scheme delivery strategy and requirements, could significantly impact the delivery and final product of the interventions.

17.1.3 TC understands that a similar delivery strategy was used on Phase 1 at Euston and in Birmingham and is essential to manage the delivery of the Proposed Scheme and its interfaces with wider developments and transport schemes.

17.1.4 TC also requires clearer understanding of the proposed programme of works for the Proposed Scheme to enable co-ordination with other major development proposals and events affecting traffic and activity levels within Trafford and in the vicinity of Manchester Airport.

Request:

17.1.5 TC requests that the Promoter be required to give an undertaking to work jointly with TC, TfGM, GMCA and other GM Partners to:

- a) Jointly develop and agree integrated delivery strategies and governance processes for the Proposed Scheme and forthcoming development opportunities within Manchester City centre, around Manchester Airport and along the route so far as it passes through Greater Manchester;
- b) Jointly develop and agree a co-ordinated programme of works that takes account of all major developments and events in the city region;
- c) Share with, and have regard to comments received from, TC, TfGM and other GM Partners on the programme;
- d) Implement measures to mitigate the effect of the programme of development on residents, businesses and pedestrians; and

- e) Provide support to businesses affected by the programme of works, such as signage and assistance with arranging alternative delivery routes.

17.2 Economy & Labour Market

17.2.1 TC is concerned about how the necessary labour will be made available for the Proposed Scheme without increasing costs and/or timescales of wider initiatives. The pandemic has had a marked effect on employment in the construction sector which fell by 13% in GM between 2019 and 2020. This reduction in the availability of labour in the sector presents a challenge for the delivery of the Proposed Scheme but may also potentially affect delivery of GM's ambitions in relation to housebuilding and the retrofit of existing homes.

17.2.2 The National Skills Academy for Rail (NSAR) have assessed that, across the North West, the relevant phase of HS2 will require an estimated 107,500 'person-years' in labour terms. Around 75% of this labour demand will be in Construction, with peak demand forecast for 2029/2030 at around 17,500 workers, a third of whom will require Level 4+ skills, with a further 40% at Levels 2/3.

17.2.3 The second main area of demand will be Rail Engineering in which roles at levels 3 (technicians) and 5 (engineers and managerial roles) will be in greatest demand, expected to build to a peak in 2026/27 at around 2,500 workers before dipping, followed by a second peak from 2029/30.

Request:

17.2.4 TC requests that the Promoter be required to give an undertaking to agree with TC, TfGM, other GM local authorities and GMCA to develop an education and skills plan to ensure the availability of local construction skills to ensure the necessary local labour force is available to service the Proposed Scheme and other strategic initiatives. This plan should include:

- (a) Provision of local labour and relevant training opportunities to local employees, including those affected by business closure/relocation so that they are in a strong position to access local construction jobs;
- (b) Provision of financial compensation for the loss of any part of business rate income within the relevant local authorities where the development of the Proposed Scheme has been demonstrated to cause businesses to fail or had a significant impact on their income; and
- (c) Collaboration with TC and other bodies such as TfGM, GMCA, other GM local authorities and the Education and Skills Funding Agency to develop a Training and Employment Opportunities Management Plan which clearly states how local employment will be prioritised and the timeframe for the provision of new training in accordance with the GM PfE Policies JP-Strat 1 and 2.

17.3 Collaboration and Stakeholder Management

17.3.1 Effective stakeholder engagement, collaboration and communications will be essential to support the delivery and operation of the Proposed Scheme, including at the detailed design phase, to minimise disruption, particularly for public transport users, residents, businesses and visitors to the region.

- 17.3.2 Failure to do so will increase disruption as well as cost, programme, quality and reputational risks unnecessarily. This concern is further strengthened by the feedback on HS2 Phase 1 and 2a.

Request:

- 17.3.3 TC requests that the Promoter be required to give an undertaking to develop and agree a stakeholder engagement and communication plan with TC and to commit to implementing this plan, working collaboratively with TC, TfGM and the GM Authorities.

17.4 Code of Construction Practice

- 17.4.1 TC is concerned with the high-level and generic nature of the CoCP document and therefore does not believe that this will provide an adequate framework to effectively mitigate the impact on local communities and the public transport network during construction.

- 17.4.2 TC is also concerned by the experience of local authorities on Phases 1 and 2a, which indicates that the nominated undertaker's contractors do not provide meaningful additional detail to address specific local concerns.

Request:

- 17.4.3 TC requests that the Promoter be required to give an undertaking to update and agree the CoCP with TC, TfGM and other relevant local authorities in so far as it relates to Greater Manchester.

17.5 Coordination planning of Utilities works across Greater Manchester (GM)

- 17.5.1 Works to divert or protect utilities will be required to facilitate the HS2 enabling works and HS2 works identified within the Bill. To fully capitalise on the transport and economic opportunities offered by the Proposed Scheme, other GM developments will be looking to be brought forward in similar locations and timeframes. This has the potential to lead to even greater disruption in the undertaking of the utility works and create abortive works or duplication of effort.

Request:

- 17.5.2 TC requests that the Promoter be required to give an undertaking that protections will be provided to ensure that the Promoter is required to work jointly with the utility companies and TC to ensure that all utility diversions, network reinforcement and supply of new connections consider current and future developments.

17.6 Emergency Response times

- 17.6.1 TC is concerned that construction of the Proposed Scheme will impact on the response times of Greater Manchester Fire & Rescue Service (GMFRS) fire appliances and Greater Manchester Police (GMP) emergency response vehicles, including armed response vehicles, in Trafford and throughout GM, both through the temporary and permanent closure of thoroughfares, and the increase in traffic this will create on other roads.

Request:

17.6.2 TC requests that the Promoter be required to enter into an undertaking with TC, GMFRS, GMP and other local highways authorities in Greater Manchester to reduce the impact of construction works on emergency access and response times.

18 Golborne Link (GL)

18.1.1 TC notes the instruction to remove the Golborne Link (GL) from the Bill, and that the Committee should not hear petitions to the extent that they relate to the inclusion, or otherwise, of the GL. However, TC had significant issues with the GL as summarised below and therefore any alternative proposal replacing the GL would need to fully address these issues in order to be acceptable to TC.

18.2 Issues with the GL

18.2.1 The GL would have severed the A6144 Paddock Lane link between the neighbouring communities of Warburton and Moss Brow.

18.2.2 The GL would have required the construction of a substantial and lengthy viaduct over the Manchester Ship canal which would have had significant adverse environmental effects including visual, noise and vibration impacts.

18.2.3 The GL would have caused a wide-ranging loss of habitat and landscape features (i.e., hedgerows, trees, ponds etc.) due to inadequate habitats and species surveys undertaken. There were also concerns over the Proposed Scheme's ability to deliver a minimum 10% biodiversity net gain.

18.2.4 The construction and operation of the GL would have had significant adverse impacts on human health resulting from noise and air quality impacts.

18.2.5 TC had concerns regarding existing over-capacity issues on the highway network, most notably on the A6144 and M60 Junction 8, which would have been exacerbated by the GL.

18.2.6 The proposed PfE allocation at New Carrington was not included within the transport modelling for the GL.

18.2.7 TC had concerns around the assumptions used to undertake the airborne construction noise and ground-borne construction vibration assessments and regarding insufficient baseline noise modelling for the assessment of traffic noise.

18.2.8 There was a lack of information on construction works and flood risk management/runoff and drainage volumes/modelling for watercourses and surface water flows associated with the GL.

3. What do you want to be done in response?

In the box below, tell us what you think should be done in response to your objections to the Bill. You do not have to complete this box if you do not want to.

You can include this information in your response to the section 'Objections to the Bill' if you prefer. Please number each paragraph.

TC seeks binding commitments from the Promoter and/or amendments to the current proposals in the Bill and supporting documents in respect of the matters set out above.